

PLAINTIFF'S  
EXHIBIT

**36**

# EXHIBIT 6

Jayla Allen, et al. vs. Waller County Texas, et al.  
Joshua Jamil Muhammad - 10/10/2019

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF TEXAS 3 HOUSTON DIVISION</p> <p>3 JAYLA ALLEN, DAMON ) JOHNSON, TREASURE SMITH, ) 4 AND THE PANTHER PARTY, ) Plaintiffs, )</p> <p>5 VS. ) CIVIL ACTION NO.: 6 ) 4:18-CV-3985</p> <p>7 WALLER COUNTY TEXAS; THE ) WALLER COUNTY ) 8 COMMISSIONERS COURT; ) JUDGE CARBETT "TREY" J. ) 9 DUHON III, IN HIS ) OFFICIAL CAPACITY AS THE ) 10 WALLER COUNTY JUDGE; AND ) CHRISTY A. EASON, IN HER ) OFFICIAL CAPACITY AS THE ) 11 WALLER COUNTY ELECTIONS ) ADMINISTRATOR, ) 12 Defendants. )</p> <p>13 ***** 14 ORAL DEPOSITION OF JOSHUA JAMIL MUHAMMAD OCTOBER 10, 2019 15 *****</p> <p>16 ORAL DEPOSITION OF JOSHUA JAMIL MUHAMMAD, 17 produced as a witness at the instance of the Defendants, 18 and duly sworn, was taken in the above-styled and 19 numbered cause on OCTOBER 10, 2019, from 9:10 a.m. to 20 1:40 p.m., before SHERRI SANTMAN FISHER, Certified 21 Shorthand Reporter in and for the State of Texas, 22 reported by machine shorthand, at the University Square 23 Clubhouse, 502 Anne Preston Street, Prairie View, Texas, 24 pursuant to the Federal Rules of Civil Procedure and the 25 provisions stated on the record or attached hereto.</p>	<p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances 2</p> <p>4 Stipulations 5</p> <p>5 Examination by Mr. Seaquist 5 9:10 a.m. - 10:23 a.m. 10:30 a.m. - 11:13 a.m. 6 11:23 a.m. - 1:02 p.m. 1:11 p.m. - 1:11 p.m.</p> <p>7 Examination by Ms. Aden 172 1:12 p.m. - 1:40 p.m.</p> <p>8 Changes and Corrections 201</p> <p>9 Signature 202</p> <p>10 Reporter's Certification 203</p> <p>11</p> <p>12</p> <p>13 EXHIBIT INDEX</p> <p>14 NO. DESCRIPTION PAGE</p> <p>15 1 Defendants' First Amended Rule 30(B)(6) 11 Notice of Intention to Take the Deposition of Plaintiff, The Panther 16 Party</p> <p>17 2 Plaintiff The Panther Party's Response 15 and Objections to Defendant Waller County's First Set of Interrogatories</p> <p>18 3 Certificate of Filing of The Panther 16 Party</p> <p>19</p> <p>20 4 The Panther Party Constitution and 18 Bylaws</p> <p>21 5 Notice Dated 03-28-2017 to Panther 19 Party</p> <p>22</p> <p>23 6 Twitter Post Dated November 4, 2018 77</p> <p>24</p> <p>25 7 Twitter Post Dated August 19, 2018 82</p>
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<p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFFS:</p> <p>4 MS. LEAH ADEN MR. JOHN CUSICK 5 NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC. 40 Rector Street 6 Fifth Floor New York, New York 10006-1738 7 212-965-7715/212-226-7592 (fax) laden@naacpldf.org 8 jcusick@naacpldf.org 9 MS. JULIE GOODRICH HARRISON NORTON ROSE FULBRIGHT US LLP 10 1301 McKinney Suite 5100 11 Houston, Texas 77010-3095 713-651-5151/713-651-5246 (fax) julie.harrison@nortonrosefulbright.com</p> <p>12</p> <p>13 FOR THE DEFENDANTS:</p> <p>14 MR. GUNNAR P. SEAQUIST BICKERSTAFF HEATH DELGADO ACOSTA LLP 15 3711 South Mopac Expressway Building 1, Suite 300 Austin, Texas 78746 16 512-472-8021/512-320-5638 (fax) gseaquist@bickerstaff.com</p> <p>17</p> <p>18 MS. ELIZABETH DORSEY WALLER COUNTY DISTRICT ATTORNEY'S OFFICE 19 645 12th Street Hempstead, Texas 77445 20 979-826-7718/979-826-7722 (fax) e.dorsey@wallercounty.us</p> <p>21</p> <p>22</p> <p>23 ALSO PRESENT:</p> <p>24 Steven Lance</p> <p>25</p>	<p>1 EXHIBIT INDEX (continued)</p> <p>2 NO. DESCRIPTION PAGE</p> <p>3 8 Twitter Post Dated October 9, 2018 89</p> <p>4 9 Screenshot Dated October 12, 2018 101</p> <p>5 10 Twitter Post Dated October 26, 2018 107</p> <p>6 11 Twitter Posts 117</p> <p>7 12 Google Map 131</p> <p>8 13 PVAMU Transportation Schedule 136</p> <p>9 14 2018 General Election Early Voting 152 Locations</p> <p>10</p> <p>11 15 Twitter Posts 155</p> <p>12</p> <p>13 16 Twitter Posts 161</p> <p>14</p> <p>15 17 Prairie View A&amp;M University Map 162</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 JOSHUA JAMIL MUHAMMAD, 2 having been first duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. SEAQUIST: 5 Q. Good morning, Mr. Muhammad. My name is Gunnar 6 Seaquist. 7 A. Uh-huh. 8 Q. And I don't think you and I have met before 9 today. Is that correct? 10 A. No, sir, but pleasure to meet you. 11 Q. Nice to meet you as well. Thank you for your 12 time this morning. 13 MR. SEAQUIST: Before we launch into it, 14 counsel for plaintiffs and defendants have conferred 15 prior to the deposition and agree to waive the reading 16 requirements of Federal Rule 30(b)(5). 17 Counsel, have I stated that correctly? 18 MS. ADEN: That's correct. 19 Q. (BY MR. SEAQUIST) Mr. Muhammad, will you give 20 us your full name for the record, please, sir? 21 A. Joshua Jamil Muhammad. 22 Q. Okay. 23 A. Muhammad, M-u-h-a-m-m-a-d. 24 Q. Thank you. 25 Are there any other names you go by?</p>	<p>1 Q. Okay. And we'll get to them. Julie Harrison 2 is here from Norton Rose Fulbright? 3 A. Yes. 4 MR. SEAQUIST: Is that what it is now? 5 MS. HARRISON: That's right, yeah. 6 Q. (BY MR. SEAQUIST) Okay. And Mr. John Cusick 7 from the NAACP Legal Defense Fund is also here, correct? 8 A. Correct. 9 Q. Okay. Have you ever given a deposition before? 10 A. No, sir. 11 Q. All right. A couple of ground rules. First of 12 all, as you can tell, we've got our court reporter here. 13 She's trying to take down our conversation this morning. 14 So both you and I have to try not to talk over each 15 other. Okay? 16 A. Correct. Understood. 17 Q. So if you will -- I'm already doing it. But if 18 you will, do your best to let me finish my question 19 before you give your answer and I'm going to do my very 20 best to let you answer the question fully before I ask 21 my next one so we're not talking over each other. Okay? 22 A. Understood. 23 Q. Also, this is not a marathon. If you need a 24 break at any time, let me know. I'm happy to 25 accommodate you. I would just ask that if there's a</p>
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<p>1 A. Perkins, as a last name. 2 Q. Okay. I assume by that that your name at birth 3 was Joshua Perkins? 4 A. Yeah, you can say that. 5 Q. Okay. And at some point you changed it to 6 Joshua Muhammad. 7 A. Yes, religious reasons. 8 Q. Understood. 9 At what point did you make that change, 10 sir? 11 A. Well, my parents' name, when they became 12 Muslims, were Perkins; and so I was always technically 13 born with the name Muhammad. 14 Q. Okay. Thank you for explaining that. 15 But in terms of going by the name 16 Muhammad, at what age did you start going by the name 17 Muhammad? Or have you always? 18 A. I always went by the name Muhammad. 19 Q. Understood. Thank you, sir. 20 What's your current address, please? 21 A. 3106 Trail Lake Drive, Houston, Texas 77045. 22 Q. And you are represented here today by counsel 23 for the NAACP Legal Defense Fund, Ms. Leah Aden, 24 correct? 25 A. Yes. And also Norton as well, too.</p>	<p>1 question on the table, you answer that one before we 2 take a break. Okay? 3 A. Makes sense. 4 Q. If for any reason -- and I'm sure it will 5 happen at some point today -- I ask you a question 6 that's unclear, can I have your agreement that you'll 7 let me know that it's unclear or you don't understand 8 it? 9 A. I will. 10 Q. All right. And if you'll do that, I'm happy to 11 rephrase it for you and make it clear. But if you do 12 answer one of my questions, can we have an agreement 13 that you understood it and gave your very best answer? 14 A. Yes, sir. 15 Q. All right. Thank you. 16 If at any point during the deposition 17 today you remember, you know, some information later on 18 to an earlier question or if there's something you need 19 to clarify, you're welcome to do that. Just let me 20 know. Okay? 21 A. Yes, sir. 22 Q. Also, for purposes of the record, a lot of 23 times when we are in conversation, we'll use nonverbal 24 cues, headshakes, head nods, or uh-huh and huh-uh. 25 A. Uh-huh.</p>

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<p style="text-align: right;">Page 9</p> <p>1 Q. Today, just for purposes of the record, I'm 2 going to really need you to answer out loud and also to 3 say, you know, yes or no. So if I prod you for that, 4 I'm not trying to be rude. I'm just trying to get a 5 good record. Okay? 6 A. Makes sense. 7 Q. Okay. Is there any reason today that you'd be 8 unable to understand and truthfully answer my questions? 9 A. No, sir. 10 Q. Okay. For example, you're not taking any 11 medications that would impair your ability to understand 12 or answer my questions? 13 A. No, sir. 14 Q. Okay. Now, we've identified your counsel who 15 are here today. Have you had an opportunity to meet 16 with them in advance of the deposition? 17 A. Yes, I have. 18 Q. Okay. I don't want to know what you talked 19 about, but can you tell me how long you met with counsel 20 prior to this deposition? 21 A. There was a meeting yesterday, probably an hour 22 or two. 23 Q. Okay. 24 A. And then a conference call, previous conference 25 calls, probably about less than an hour, 30 minutes to</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. You understand that you are here today to 2 testify as a designated representative of The Panther 3 Party? 4 A. Yes. 5 Q. And The Panther Party is a named plaintiff in 6 this lawsuit. 7 A. Yes. 8 Q. I'm going to mark -- 9 (Exhibit No. 1 marked) 10 Q. (BY MR. SEAQUIST) I'll hand you what I have 11 marked as Exhibit 1. 12 All right. Exhibit 1 is the first amended 13 Rule 30(b)(6) notice of deposition for the deposition 14 this morning. I think this is one of the documents that 15 you referenced as having reviewed prior to the 16 deposition. Is that correct? 17 A. Correct. 18 Q. Okay. And if we look at page four of Exhibit 19 1, there is a list of topics on which you've been 20 designated to testify today. Do you see that? 21 A. Yes. 22 Q. Have you had an opportunity to review that 23 list? 24 A. Yes. 25 Q. And are you prepared today to testify on those</p>
<p style="text-align: right;">Page 10</p> <p>1 an hour. 2 Q. Okay. And in that meeting yesterday, was that 3 with the counsel that are here today? 4 A. Yes. 5 Q. Have you done anything else to prepare for this 6 deposition today? 7 A. Looked over discoveries. I also met with -- 8 met with my counsel and met with members of The Panther 9 Party, who I'm here representing. 10 Q. Did you -- you said you looked over the 11 discovery. What discovery did you look at? 12 A. The discovery that was requested from the 13 defense that I had to answer questions for. 14 Q. Okay. Did you bring any documents to your 15 deposition today? 16 A. Yes. 17 Q. What documents have you brought with you today? 18 A. The discovery and -- yeah, the discovery and 19 some other questions that you all -- some items that you 20 all provided, the plaintiff -- the defense provided. 21 Q. Okay. Thank you. 22 Did you prepare any documents in 23 preparation for your deposition today? 24 A. No. Just looked it over, took some notes, 25 personal notes.</p>	<p style="text-align: right;">Page 12</p> <p>1 topics? 2 A. Yes. 3 Q. We're here taking the corporate rep deposition 4 for The Panther Party today, but I'd like to get a 5 little background information on you first, if I could. 6 What year were you born, sir? 7 A. I was born in 1990. 8 Q. Okay. And where were you born? 9 A. Houston, Texas. 10 Q. Did you grow up in Houston? 11 A. Yes, sir. 12 Q. What area of Houston did you grow up in? 13 A. The south side. 14 Q. Where did you attend high school? 15 A. Bellaire High School. 16 Q. What year did you graduate? 17 A. 2009. 18 Q. Are you currently a student at Prairie View 19 A&amp;M? 20 A. No, sir. I graduated December 2018. 21 Q. Congratulations. 22 A. Thank you. 23 Q. You graduated 12 of '18. What year did you 24 start Prairie View A&amp;M, sir? 25 A. Two thousand either fourteen or fifteen.</p>

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<p>1 Q. And did you attend Prairie View A&amp;M</p> <p>2 continuously during that period?</p> <p>3 A. Yes.</p> <p>4 Q. Until you graduated?</p> <p>5 A. Yes, sir.</p> <p>6 Q. What was your major?</p> <p>7 A. Electrical engineering.</p> <p>8 Q. How did you come to choose Prairie View as a</p> <p>9 university?</p> <p>10 A. My mother went here. And that's -- when I</p> <p>11 switched my major to electrical engineering, I figured</p> <p>12 they had one of the best engineering programs,</p> <p>13 especially as an HBC, which is a historically black</p> <p>14 college or university.</p> <p>15 Q. Had you gone to any universities or colleges</p> <p>16 prior to coming to Prairie View?</p> <p>17 A. Houston Community College. I got accepted into</p> <p>18 the University of Houston but didn't go.</p> <p>19 Q. You mentioned that your mother was a PVAMU</p> <p>20 alum?</p> <p>21 A. Yes.</p> <p>22 Q. Do you know what year she graduated?</p> <p>23 A. No.</p> <p>24 Q. Do you know roughly how old she is?</p> <p>25 A. Whatever -- she was born in 1961, so whatever</p>	<p>1 A. Correct.</p> <p>2 Q. Who is the other cofounder?</p> <p>3 A. Ervin Bryant.</p> <p>4 Q. Do you know? Is Mr. Bryant still a student at</p> <p>5 Prairie View A&amp;M?</p> <p>6 A. I believe so.</p> <p>7 Q. And you -- or the plaintiffs in this case have</p> <p>8 answered some interrogatory requests by the defendants</p> <p>9 as it relates to The Panther Party.</p> <p>10 (Exhibit No. 2 marked)</p> <p>11 Q. (BY MR. SEAQUIST) I'm going to hand you what</p> <p>12 I've marked as Exhibit 2. And do you recognize Exhibit</p> <p>13 2, sir?</p> <p>14 A. It looks like every other document, but I think</p> <p>15 I do recognize it.</p> <p>16 Q. Do you recall -- and I don't want the substance</p> <p>17 of the conversation, but do you recall being asked to</p> <p>18 provide information to respond to the questions in that</p> <p>19 document?</p> <p>20 A. Yes.</p> <p>21 Q. All right. And did you, in fact, do so?</p> <p>22 A. Yes.</p> <p>23 Q. And were the answers you provided in response</p> <p>24 to the interrogatories there true and correct?</p> <p>25 A. Yes.</p>
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<p>1 that gets you.</p> <p>2 MS. ADEN: And, Gunnar, just for the</p> <p>3 record, some of this, I'm not sure if that's outside of</p> <p>4 the scope of his coming in his capacity as the 30(b)(6)</p> <p>5 representative of the party. But I'll give you some</p> <p>6 leeway to see where it goes, but I just wanted to put</p> <p>7 that on the record.</p> <p>8 MR. SEAQUIST: Okay. I appreciate that.</p> <p>9 I'm not going to go very deep into this.</p> <p>10 Q. (BY MR. SEAQUIST) Any other members of your</p> <p>11 family who were PVAMU alums?</p> <p>12 A. Some uncles, cousins.</p> <p>13 Q. When you were a student here, were you involved</p> <p>14 in the Student Government Association?</p> <p>15 A. Yes, sir.</p> <p>16 Q. In what role, sir?</p> <p>17 A. I was a parliamentarian, senator, sat on the</p> <p>18 executive board.</p> <p>19 Q. Okay.</p> <p>20 All right. You are here today as a</p> <p>21 representative of The Panther Party. My understanding</p> <p>22 from the discovery is you are a cofounder of The Panther</p> <p>23 Party --</p> <p>24 A. Correct.</p> <p>25 Q. -- at Prairie View A&amp;M.</p>	<p>1 Q. Okay. When was The Panther Party formed?</p> <p>2 A. Officially?</p> <p>3 Q. Yes, please.</p> <p>4 A. It was formed in 2017, spring of 2017.</p> <p>5 Q. And what led you and Mr. Bryant to found The</p> <p>6 Panther Party?</p> <p>7 A. It came after -- in 2015, after the Sandra</p> <p>8 Bland incident. Informally, it was a group of students</p> <p>9 under the name The Panther Party working in that -- in</p> <p>10 that regard. And then the goal -- the scope expanded</p> <p>11 into the interests of Prairie View as a whole. And so</p> <p>12 we decided we needed a platform to engage in that -- in</p> <p>13 those interests and thus was born The Panther Party.</p> <p>14 Q. Okay. How would you describe The Panther Party</p> <p>15 as a group?</p> <p>16 A. You can call it a -- it's multifaceted. You</p> <p>17 can call it a quasi-political organization, call it a</p> <p>18 community development organization. We also do economic</p> <p>19 development.</p> <p>20 (Exhibit No. 3 marked)</p> <p>21 Q. (BY MR. SEAQUIST) I'm handing you what I've</p> <p>22 marked as Exhibit 3 to the deposition today. Do you</p> <p>23 recognize Exhibit 3, sir?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Okay. This is a document that was produced by</p>

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<p style="text-align: right;">Page 17</p> <p>1 the plaintiffs to the defense in discovery. It is a 2 certificate of filing of The Panther Party. Is this 3 Exhibit 3 a true and correct copy of the certificate of 4 filing for The Panther Party? 5 A. Yes, it looks correct. 6 Q. And this indicates that the -- at least the 7 certificate of filing was dated and effective March 28, 8 27. Do you see that? 9 A. Yes, sir. 10 Q. I'm sorry. 2017. 11 A. Yeah. 12 Q. And that's consistent with what you told us in 13 terms of the period of founding, correct? 14 A. Spring 2017, correct. 15 Q. Okay. And so this document indicates that The 16 Panther Party is a domestic nonprofit corporation. Is 17 that your understanding? 18 A. Yes, sir. 19 Q. Now, The Panther Party -- well, the plaintiffs 20 have also produced to us a document entitled "The 21 Panther Party Constitution and Bylaws". Are you 22 familiar with that document? 23 A. Yes, sir. 24 Q. How did this -- how did the bylaws and 25 constitution come to be adopted?</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Yes, sir. 2 Q. Are you aware of any other amendments or -- 3 well, are you aware of any amendments to this document 4 since that time? 5 A. No, sir. 6 MR. SEAQUIST: I'm going to mark Exhibit 7 5. 8 (Exhibit No. 5 marked) 9 Q. (BY MR. SEAQUIST) Mr. Muhammad, Exhibit 5, 10 which is plaintiffs -- Bates labeled Plaintiffs 324 to 11 326, is another document that was produced to us by the 12 plaintiffs. It is a -- well, let me ask you. Do you 13 recognize this document, sir? 14 A. Yes. 15 Q. And what is it? 16 A. It's the -- it's a letter from the IRS with the 17 tax ID number. 18 Q. Is this a true and correct copy of the IRS 19 notification to The Panther Party of its tax ID number? 20 A. It looks official. 21 Q. Okay. The address here is Panther Party care 22 of Joshua Perkins. Do you see that? 23 A. Yes. 24 Q. But that would be you, Mr. Muhammad? 25 A. Yes.</p>
<p style="text-align: right;">Page 18</p> <p>1 A. Originally we wrote them when we first started 2 The Panther Party as initially a student organization. 3 Then there were probably some amendments in between 4 there in them. 5 Q. Okay. 6 (Exhibit No. 4 marked) 7 (Discussion off the record) 8 MR. SEAQUIST: All right. Back on the 9 record. 10 Q. (BY MR. SEAQUIST) We have marked Exhibit 4. 11 Have you seen the document that is Exhibit 4 before? 12 A. Yes, sir. 13 Q. Okay. What is this document, sir? 14 A. The Panther Party constitution and bylaws for 15 the student organization. 16 Q. And you had mentioned earlier that there might 17 have been a prior version of this document? 18 A. Yes, sir. 19 Q. What date was -- does this document indicate it 20 was adopted? 21 A. It was adopted March 28, 2018. It was ratified 22 April 18, 2018. 23 Q. To your knowledge, would this have been the 24 constitution and bylaws in effect after April 18th of 25 2018?</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay. And the address there is P.O. Box 2348, 2 Prairie View, Texas 77446? 3 A. Correct. 4 Q. Is that the mailing address for The Panther 5 Party? 6 A. It was switched. It's not the current mailing 7 address. 8 Q. When was it switched, sir? 9 A. I couldn't tell you. 10 Q. Okay. Did you initially establish this 11 address? 12 A. Yes, sir. 13 Q. And where is this P.O. box located? 14 A. It's a post office. 15 Q. Is that the post office at the edge of the 16 Prairie View campus? 17 A. Yes, sir. 18 Q. I'd like to talk for a minute about the 19 leadership structure of The Panther Party. 20 Your interrogatory responses indicate that 21 there is a president, vice-president, secretary, and 22 treasurer position. Is that correct? 23 A. Correct. 24 Q. Are there any other leadership or officer 25 roles?</p>



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<p style="text-align: right;">Page 21</p> <p>1 A. For the registration for the State, as a 2 nonprofit, there is a board of directors, mainly for 3 oversight; and then for the actual student organization, 4 which most of the activity is ran through, there is 5 committee chairs. 6 Q. How many people are on the board of directors? 7 A. Three. 8 Q. Let me ask you, now that you have graduated, do 9 you still consider yourself a member of The Panther 10 Party? 11 A. Alumni member, but more so just for oversight 12 when it comes to being on the board of directors. 13 Q. And that's my next question. Are you still on 14 the board of directors? 15 A. Yes. 16 Q. And what's your formal title on the board? 17 A. It's not necessarily a formal title, but just 18 one of the board of directors. You can call it chairman 19 of the board. 20 Q. Do you consider yourself the chairman of the 21 board of directors? 22 A. Acting, yes. 23 Q. And then there are two other board members? 24 A. Yes. 25 Q. Are any of the other board members named</p>	<p style="text-align: right;">Page 23</p> <p>1 elect the -- the E board of the student organization. 2 Q. You said E board. What do you mean? 3 A. So a student organization at Prairie View. 4 There will be two components of The Panther Party. 5 There's the nonprofit corporation. Then there's the 6 actual student organization. So that's actually 7 registered on the campus at Prairie View. 8 Q. Registered with whom? 9 A. Student engagement, the university. 10 Q. So it's actually registered as a student group 11 with the university. 12 A. Yes. 13 Q. Okay. And does the board of directors for the 14 nonprofit oversee the student organization as well? 15 A. There is some oversight. It's more so there 16 for formality sake to be registered as a nonprofit 17 corporation. 18 Q. Okay. You mentioned, I think, a minute ago, 19 but I just want to make sure I understood you correctly, 20 that the board of directors for the nonprofit 21 corporation has been the same since its formation. 22 A. Yeah. There was like one change. 23 Q. Okay. What was -- when was that change? 24 A. Probably last year. I'm not sure of the exact 25 date.</p>
<p style="text-align: right;">Page 22</p> <p>1 plaintiffs in this lawsuit? 2 A. No. 3 Q. Are the other board members current Prairie 4 View students? 5 A. Yes. 6 Q. So you're the only alumni board member. 7 A. Correct. 8 Q. How are board members chosen? 9 A. Mainly with a vote of the board pretty much. 10 That's basically it. There's different ways, but that's 11 mainly. 12 Q. So the board elects its own members. The 13 members don't -- excuse me. 14 The board elects its own members. The 15 members of The Panther Party don't elect the board 16 members directly. 17 A. Not necessarily, no. 18 Q. Help me understand your answer. 19 A. So I mean, you can have it to where -- it's 20 been the same since like the founding of it. It's been 21 the same board members, because you had to have three 22 just to make a nonprofit corporation. So there wasn't a 23 lot of formalities in establishing that. The only thing 24 you needed was a -- pretty much a two-thirds vote. But 25 then also the -- the body has a say-so, but they mainly</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. But you've been on the board of 2 directors the whole time. 3 A. Yes. 4 Q. In the interrogatory responses you list the 5 current president as a Mr. Burton? 6 A. Yes. 7 Q. Can you tell me how to pronounce his first 8 name? 9 A. Tajaun Burton. 10 Q. When did he become the president of The Panther 11 Party? 12 A. He started his term this semester. 13 Q. "This semester" being fall of 2019? 14 A. Yes. 15 Q. Is he the president both of the nonprofit and 16 the student organization or is the president more one 17 organization or the other? 18 A. President is mainly for the student 19 organization. 20 Q. Prior to Mr. Burton, who was the president? 21 A. A lady by -- an alumni by the name of Nia 22 Scott. 23 Q. And do you know how long Ms. Scott's term was 24 or the dates for which she was the president? 25 A. Only a semester.</p>

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<p>1 Q. So spring of --</p> <p>2 A. Twenty --</p> <p>3 Q. -- '19?</p> <p>4 A. I guess that would be right. Was -- yes,</p> <p>5 spring of 2019, correct.</p> <p>6 Q. Before Ms. Scott, who was the president?</p> <p>7 A. Ervin Bryant.</p> <p>8 Q. And what was his term, if you know, sir?</p> <p>9 A. He was fall of 2018.</p> <p>10 Q. Is it typical that a president only serves one</p> <p>11 semester?</p> <p>12 A. No. There was some administrative changes</p> <p>13 happening in The Panther Party.</p> <p>14 Q. What were those?</p> <p>15 A. Some people were leaving, graduating, so we had</p> <p>16 to shuffle some things around. Some people just were --</p> <p>17 as students, we got too busy, so --</p> <p>18 Q. So prior to Mr. Bryant who was the president?</p> <p>19 A. I was the president.</p> <p>20 Q. And how long were you the president?</p> <p>21 A. From the -- a full year, from fall -- whatever</p> <p>22 the year was before that. So that would be fall two --</p> <p>23 no. Spring -- no. Fall 2017, I believe, to spring</p> <p>24 2018. I think that was it.</p> <p>25 Q. The current vice-president indicated in your</p>	<p>1 how long Mr. Brown was the vice-president?</p> <p>2 A. He was there for a semester as well, too.</p> <p>3 Before he was vice-president, he served as a committee</p> <p>4 chair.</p> <p>5 Q. Which committee was he the chair of?</p> <p>6 A. Political engagement.</p> <p>7 Q. We'll talk some more about the committee</p> <p>8 structure in a little bit.</p> <p>9 In your interrogatory responses, you've</p> <p>10 indicated that there's a secretary position but that it</p> <p>11 is empty at the moment. Is that still the case?</p> <p>12 A. Yes.</p> <p>13 Q. Has there ever been a secretary?</p> <p>14 A. Yes.</p> <p>15 Q. When was that?</p> <p>16 A. In every year prior to this one.</p> <p>17 Q. Okay. What is the role of the secretary?</p> <p>18 A. Meeting minutes, keep track of documentation,</p> <p>19 the generic role of a secretary.</p> <p>20 Q. Other than meeting minutes, what type of</p> <p>21 documents does The Panther Party maintain?</p> <p>22 A. Meeting minutes, meeting agendas, some of the</p> <p>23 documents that I provided when it comes to constitution</p> <p>24 and bylaws, those mainly documents.</p> <p>25 THE REPORTER: I'm sorry?</p>
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<p>1 interrogatory responses is a Mr. Maydrian Lowe?</p> <p>2 A. He was, but it's changed. He also got too</p> <p>3 busy. He was the -- he was supposed to start his term</p> <p>4 this semester, but he had a lot of other positions that</p> <p>5 he was a part of, so we switched our vice-president.</p> <p>6 Q. So he started in the fall of '19, but it's been</p> <p>7 switched since.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Can you walk me back on the</p> <p>10 vice-president -- who was the vice-president before</p> <p>11 Mr. Lowe?</p> <p>12 A. Before Mr. Lowe, I believe Tajaun was the</p> <p>13 vice-president and then he became the president. Before</p> <p>14 him, Antonious Brown was the vice-president. And then</p> <p>15 before him, Ervin Bryant was the vice-president.</p> <p>16 Q. So Mr. Bryant was the vice-president -- was</p> <p>17 your vice-president, so to speak.</p> <p>18 A. Yes, correct.</p> <p>19 Q. And what were the dates that Mr. Bryant was the</p> <p>20 vice-president?</p> <p>21 A. Same dates I was the president.</p> <p>22 Q. Okay. So that's fall -- or spring of '17</p> <p>23 through spring of '18.</p> <p>24 A. Yes, I believe that's correct.</p> <p>25 Q. And then after that, Mr. Brown -- do you know</p>	<p>1 THE WITNESS: Some of the documents I</p> <p>2 provided when it comes to constitution and bylaws, I</p> <p>3 guess just generic organizational documents.</p> <p>4 Q. (BY MR. SEAQUIST) Do you maintain copies of</p> <p>5 materials that the organization has had printed or</p> <p>6 prepared in the past?</p> <p>7 A. Yes. Flyers, if -- I believe that would be, to</p> <p>8 more clarify in answer to your question.</p> <p>9 Q. So if there's some sort of an informative --</p> <p>10 information flyer or other document, that's something</p> <p>11 that The Panther Party would keep a copy of?</p> <p>12 A. Copy as in, if it's used on our social media,</p> <p>13 it might not be. It may be in a folder somewhere. But</p> <p>14 if there is a flyer, we would probably post it on social</p> <p>15 media.</p> <p>16 Q. Does the -- how does The Panther Party store</p> <p>17 its documents?</p> <p>18 A. We have a Dropbox.</p> <p>19 Q. Is there any physical cabinet space or filing</p> <p>20 system?</p> <p>21 A. There's probably some loose papers somewhere</p> <p>22 around somewhere; but outside of that, we try to keep</p> <p>23 everything digitized. It makes it easier for us to get</p> <p>24 to it.</p> <p>25 Q. Sure.</p>



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<p>1 Who was the secretary in the fall of 2018, 2 if you know? 3 A. I cannot remember. 4 Q. That's something we could figure out if we 5 needed to? 6 A. Probably so. 7 Q. Your interrogatory responses also indicate that 8 there is a treasurer position but it is unfilled at the 9 moment as well. Is that true? 10 A. Correct. 11 Q. Has it been filled -- has there previously been 12 a treasurer? 13 A. Yes. 14 Q. When was the last time -- or when has there 15 been a treasurer? 16 A. There was one last year. 17 Q. So in the 2018 to 2019 year there was a 18 treasurer? 19 A. Yes. 20 Q. Was there a treasurer in the 2017 to 2018 year? 21 A. Correct. 22 Q. Was that the same person? 23 A. I don't think it was the same person. 24 Q. Do you know who the treasurer was for 2018 to 25 2019?</p>	<p>1 cash, so mainly digitized -- digital currencies. Well, 2 not digital currency. That's bitcoin. But we mainly 3 keep everything online. 4 Q. Who in the organization is responsible for 5 approving expenditures? 6 A. It's a combination of the E board mainly and 7 then our advisors look over it as well, too. We have 8 student -- faculty advisors on campus. 9 Q. Who -- let's start when it was founded. Who 10 was the faculty advisor -- well, let me ask you this. 11 When did you first -- when did the organization first 12 get a faculty advisor? 13 A. It had to have been in 2018. 14 Q. Who was that person? 15 A. It was Steve Ransom. 16 Q. And what is Mister or perhaps Doctor -- I don't 17 know -- Ransom's position with the university? 18 A. He's not a -- he just got a promotion, so 19 congrats to him. But I think he's the VP of something. 20 They have a lot of vice-presidents at Prairie View, so 21 I'm not sure. 22 Q. So is he an administrator and not a faculty 23 member? 24 A. Yeah, he's an administrator. 25 Q. Okay. Since Steve Ransom, have there been any</p>
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<p>1 A. I believe it was -- his name is Isaiah Hubbard. 2 Q. And what is the role of the treasurer? 3 A. Look over and maintain financial documents, 4 accounts payable, accounts receivable. 5 Q. Your interrogatory responses indicated that The 6 Panther Party has a bank account. 7 A. Yes. 8 Q. Is that in the name of the nonprofit 9 corporation or the student organization? 10 A. It's the same name. 11 Q. What bank do you use? 12 A. It's called Azlo. 13 Q. Could you spell that for me? 14 A. A-z-l-o. 15 Q. Is that an online institution or is there a 16 branch around here? 17 A. It's mainly online. I know it's backed up, I 18 believe, by BBVA; but it's mainly online. 19 Q. Do you know if there's a BBVA branch here in 20 Prairie View? 21 A. No, I don't know. I don't know if there is 22 one. 23 Q. To your knowledge, does The Panther Party ever 24 have to go do physical banking at a branch? 25 A. Not really. We try to not really take a lot of</p>	<p>1 other faculty member advisors -- or excuse me, 2 university employee advisors? 3 A. The advisor for this year is Mr. Jackson, Frank 4 Jackson. I believe he's governmental affairs. 5 Q. And did Mr. Jackson just assume the role of 6 faculty -- or of university advisor for The Panther 7 Party this year? 8 A. Formally, yes. 9 Q. In the fall of 2018 was the advisor still 10 Mr. Ransom? 11 A. Yes. 12 Q. Other than that advisor position that 13 Mr. Ransom held and that Mr. Jackson currently holds, 14 are there any other positions within The Panther Party 15 that are held by Prairie View employees? 16 A. No. 17 Q. Is the -- you mentioned that the student 18 organization had to be registered with the school; is 19 that correct? 20 A. Yes. 21 Q. Does it receive any financial support from the 22 school? 23 A. You can apply for financial support. 24 Q. Has that happened? 25 A. Yes.</p>

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<p>1 Q. And has the school awarded The Panther Party</p> <p>2 any financial support to your knowledge?</p> <p>3 A. I believe so.</p> <p>4 Q. Do you remember what the circumstances of that</p> <p>5 were?</p> <p>6 A. I know it's probably for an event. So mainly</p> <p>7 student organizations will apply for funding from SGA.</p> <p>8 I'm not -- I'm not actually sure which event it was, but</p> <p>9 I'm pretty sure we got money from SGA for something.</p> <p>10 Q. And when the organization is going to apply for</p> <p>11 funding from the SGA or from another branch of the</p> <p>12 school, who oversees that or coordinates that process?</p> <p>13 A. The E board.</p> <p>14 Q. And when the school awards some piece of</p> <p>15 funding, it's -- is it typically for just a specific</p> <p>16 event or purpose?</p> <p>17 A. Mainly, yes.</p> <p>18 Q. So funds earmarked for something.</p> <p>19 A. What do you -- can you clarify that?</p> <p>20 Q. Yes.</p> <p>21 The university doesn't just give The</p> <p>22 Panther Party funds just to use in any way it sees fit.</p> <p>23 A. No.</p> <p>24 Q. Is that fair?</p> <p>25 A. No, sir, they don't give us funds that way.</p>	<p>1 Q. Do you know what the current -- well, let me</p> <p>2 ask it this way. Is the current membership number about</p> <p>3 the same, around 20? Has it grown?</p> <p>4 A. The semester just started, so it's -- I'm not</p> <p>5 sure right now, but that's something I'll have to check.</p> <p>6 Q. Okay. Is there a lot of variability year to</p> <p>7 year in terms of the membership numbers?</p> <p>8 A. Yes, based on people graduating, if they paid</p> <p>9 their dues. And then you have people still being</p> <p>10 associated with the Panther Party, but they may not be</p> <p>11 technically a member.</p> <p>12 Q. Are there any other alumni members?</p> <p>13 A. Not necessarily members, but alumni who were</p> <p>14 once members who are still associated with The Panther</p> <p>15 Party.</p> <p>16 Q. What do you mean by associated with it?</p> <p>17 A. I mean there's a GroupMe. So they're still in</p> <p>18 the GroupMe. We don't kick them out. But they don't</p> <p>19 necessarily have the full rights of a student member</p> <p>20 because they're not students anymore and they're not</p> <p>21 here, so --</p> <p>22 Q. You said a GroupMe. Can you tell me what that</p> <p>23 is?</p> <p>24 A. GroupMe is a communication app, like a chat</p> <p>25 room of sorts. It's used mainly for organizations or</p>
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<p>1 Q. So when they give you funds, it's because</p> <p>2 you've applied for it with a stated purpose and they've</p> <p>3 approved that and given you the funds to use for that</p> <p>4 reason.</p> <p>5 A. Correct.</p> <p>6 Q. Your interrogatories say that in the fall of</p> <p>7 2018 The Panther Party had approximately 20 members. Is</p> <p>8 that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Does The Panther Party maintain a membership</p> <p>11 list?</p> <p>12 A. Yes, we maintain a -- we maintain membership</p> <p>13 lists.</p> <p>14 Q. Okay. What type of information is contained on</p> <p>15 that list?</p> <p>16 A. Mainly just names and e-mails.</p> <p>17 Q. Do you gather addresses?</p> <p>18 A. Not really, no.</p> <p>19 Q. Do you indicate in any way whether the</p> <p>20 particular member lives on campus versus off campus?</p> <p>21 A. No.</p> <p>22 Q. Do you gather information or indicate in any</p> <p>23 way in your membership list whether a member is a</p> <p>24 registered voter?</p> <p>25 A. No.</p>	<p>1 classes.</p> <p>2 Q. And so that's something that all current</p> <p>3 members have access to?</p> <p>4 A. Yes.</p> <p>5 Q. And former members have access -- or have</p> <p>6 access to it as well.</p> <p>7 A. Yes.</p> <p>8 Q. All right. So of those 20 members, that</p> <p>9 includes you, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Mr. Bryant?</p> <p>12 A. Are you talking about currently or are you</p> <p>13 talking about in the past?</p> <p>14 Q. Well, do you consider yourself a current member</p> <p>15 or no?</p> <p>16 A. Not necessarily.</p> <p>17 Q. Okay.</p> <p>18 A. Not a student member.</p> <p>19 Q. Let me ask it this way. Are each of the named</p> <p>20 plaintiffs in the lawsuit -- and that is, Jayla Allen,</p> <p>21 Treasure Smith, and Damon Johnson -- are they current</p> <p>22 members of The Panther Party?</p> <p>23 A. Treasure was a -- is a former member. Jayla is</p> <p>24 still associated. We haven't collected dues yet, so I</p> <p>25 guess there's not a -- they're not members yet. Damon</p>

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<p>1 Johnson, I haven't -- I'm not sure about him.</p> <p>2 Q. Okay. So other than those folks, though, so</p> <p>3 I'm clear, although there may be some alumni who are</p> <p>4 associated with or still have access to the GroupMe, as</p> <p>5 far as the actual membership, you have to be a current</p> <p>6 Prairie View student.</p> <p>7 A. Yes.</p> <p>8 Q. You indicated in your interrogatory responses</p> <p>9 the application process to join The Panther Party was to</p> <p>10 attend an entrance meeting. Is that right?</p> <p>11 A. Interest meeting.</p> <p>12 Q. Interest?</p> <p>13 A. Yeah, interest meeting, or a general body</p> <p>14 meeting. It doesn't have to necessarily be an interest</p> <p>15 meeting.</p> <p>16 Q. So just one of the -- the general meetings of</p> <p>17 the organization.</p> <p>18 A. Yes.</p> <p>19 Q. You come to a meeting.</p> <p>20 Okay. After that, it says you can sign up</p> <p>21 by giving a student -- the student can sign up by giving</p> <p>22 their name and e-mail address. Is that right?</p> <p>23 A. Correct, mainly.</p> <p>24 Q. And then you mentioned a moment ago that there</p> <p>25 are dues. In your interrogatory responses, you said</p>	<p>1 A. I believe it was just a semester.</p> <p>2 Q. Do you remember which semester that was?</p> <p>3 A. Maybe fall 2018 going into 2019.</p> <p>4 Q. And do you know whether The Panther Party has</p> <p>5 collected dues in the current year? That would be</p> <p>6 either the spring of 2019 or the fall of 2019.</p> <p>7 A. I don't believe we've collected in fall 2019.</p> <p>8 Q. Do you know about the spring?</p> <p>9 A. No, I don't think we collected dues in the</p> <p>10 spring.</p> <p>11 Q. Do you know whether there's a plan to</p> <p>12 collect -- never mind.</p> <p>13 You mentioned in the interrogatories, I</p> <p>14 think, that The Panther Party also received some</p> <p>15 donations. Is that right?</p> <p>16 A. Yes.</p> <p>17 Q. Can you tell me how much in donations The</p> <p>18 Panther Party received in 2017 to 2018?</p> <p>19 A. I guess it would be -- the main donation, I</p> <p>20 believe, would be one from Mike Siegel of \$200.</p> <p>21 Q. Other than that one, can you think of any other</p> <p>22 donations?</p> <p>23 A. It might have been like -- we do community</p> <p>24 service events, so sometimes they'll give us like five</p> <p>25 dollars, 10 dollars, whatever have you, but I'm not sure</p>
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<p>1 that there's a 10-dollar annual fee for members.</p> <p>2 A. It may be annual or semesterly. It can change</p> <p>3 by year. I believe it was annual when I was president.</p> <p>4 I think it might have changed to semesterly the year</p> <p>5 after.</p> <p>6 Q. But you haven't always collected that fee; is</p> <p>7 that right?</p> <p>8 A. No. Sometimes we waive them.</p> <p>9 Q. Do you know whether you collect -- whether The</p> <p>10 Panther Party collected the membership fee in 2017 to</p> <p>11 2018?</p> <p>12 A. I'm not sure.</p> <p>13 Q. Do you know what the total amount of dues</p> <p>14 collected by The Panther Party in 2017 to 2018 would be?</p> <p>15 A. I wouldn't know that right now.</p> <p>16 Q. Okay. I think you indicated in your</p> <p>17 interrogatory responses that The Panther Party waived</p> <p>18 the membership fee in 2018 to 2019. Is that correct?</p> <p>19 A. Yes, I believe that was the year we waived --</p> <p>20 the semester we waived it.</p> <p>21 Q. So to your knowledge, The Panther Party</p> <p>22 collected no dues in 2017 to '18.</p> <p>23 A. For -- it was a semester.</p> <p>24 Q. I'm sorry. 2018 to 2019. It was -- the dues</p> <p>25 were waived for one semester?</p>	<p>1 of just the total right now.</p> <p>2 Q. Who at The Panther Party is responsible for</p> <p>3 keeping track of donations that have been made?</p> <p>4 A. It would be the treasurer for whatever that</p> <p>5 term was.</p> <p>6 Q. And Mr. Siegel, from your interrogatories, I</p> <p>7 believe, made that donation of \$200 in the fall of 2018.</p> <p>8 Is that correct?</p> <p>9 A. Yes, I believe that's correct.</p> <p>10 Q. You say in your interrogatory responses that</p> <p>11 that donation was for the specific purpose of conducting</p> <p>12 voter registration. Is that right?</p> <p>13 A. Correct.</p> <p>14 Q. Who is Mike Siegel?</p> <p>15 A. He was a candidate for, I believe, District 10</p> <p>16 in Texas. I think it was District 10.</p> <p>17 Q. House of Representatives candidate?</p> <p>18 A. Yeah, I believe so.</p> <p>19 Q. Do you know whether he was a Republican or</p> <p>20 Democrat?</p> <p>21 A. I believe he was a Democrat.</p> <p>22 Q. Do you know whether that person -- that</p> <p>23 donation was from him personally or from his campaign?</p> <p>24 A. I would believe it was from the campaign.</p> <p>25 Q. And so just to be clear for the record,</p>

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<p style="text-align: right;">Page 41</p> <p>1 Mr. Siegel was a candidate for the 2018 general 2 election. 3 A. Yes. 4 Q. Now, your interrogatory responses state that 5 The Panther Party did, in fact, spend that \$200 to 6 purchase food as part of a freshman voter registration 7 event. Is that right? 8 A. Yes, sir. 9 Q. Did you use all the donation for voter 10 registration? 11 A. Yes, sir. 12 Q. And to be clear, can you tell me any other 13 donations that The Panther Party received in advance of 14 the 2018 election? 15 A. That's the only one that comes to mind. 16 Q. Do you know what the balance of The Panther 17 Party bank account was at the beginning of the school 18 year in September of 2018? 19 A. No. In the bank account? 20 Q. Yes, sir. 21 A. I don't remember off the top, but it's probably 22 really close to zero. 23 Q. Is that typical that you guys don't maintain 24 much in the bank account? 25 A. Yes.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. So following the 2018 primary. 2 A. Yes, 2018 primary. I think also it would be -- 3 the local city elections were around that same time. 4 Q. And then the other one you think was in 2017? 5 A. Well, no. It was -- if one was in April of 6 2018, then the other one was in spring -- no, fall of 7 2018. 8 Q. Okay. After the general election as well. 9 A. Yes. 10 Q. And what is a voter party? 11 A. Just a party to galvanize around voting. 12 Q. And it's specifically for people who can show 13 that they voted in one of the elections? 14 A. Well, it was originally that way, but I believe 15 there was like some legal discrepancy, so we opened it 16 up to everybody because I think it was -- we couldn't do 17 that or something. 18 Q. That wasn't a gotcha question, by the way. 19 A. Yeah. 20 Q. Other than the donation from Mr. Siegel and the 21 money for the voter party from the SGA, any other 22 donations of any kind that The Panther Party would have 23 received in advance of the 2018 general election? 24 A. Outside of maybe some -- well, we collect dues. 25 So maybe outside of me coming out of my pocket for like</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. Does The Panther Party maintain banking 2 statements for the account? 3 A. Yeah, electronically. The bank provides them. 4 Q. Okay. Do you know -- you told us a little bit 5 earlier about how the university can at times contribute 6 funding to The Panther Party. Do you know whether 7 Prairie View A&amp;M or the A&amp;M System awarded any funds to 8 The Panther Party in the fall of 2018 for the -- 9 A. No. I think -- outside of SGA, I don't think 10 we got any funding. 11 Q. Okay. Do you remember what the SGA funding was 12 for? 13 A. I think we collabed on an event. 14 Q. Do you know what event that was? 15 A. It was, I believe, a voters party. 16 Q. Was that the voters party -- how many voters 17 parties has The Panther Party held? Do you know? 18 A. Two. 19 Q. And when were they? 20 A. One was in 2018 and I believe one was in two 21 thousand -- either spring 2018 or fall 2017. 22 Q. Was there one -- it looked like, from the 23 interrogatory responses, one was in April of '18. Does 24 that sound right? 25 A. That sounds correct.</p>	<p style="text-align: right;">Page 44</p> <p>1 some miscellaneous things, that's about it. 2 Q. When you pay for things out of your pocket, are 3 you reimbursed -- 4 A. No. 5 Q. -- by the organization? 6 A. No, not for the most part. 7 Q. If I wanted to know -- excuse me -- 8 specifically, you know, each of the donations and/or 9 income for The Panther Party, what would be the best 10 source for me to get that information? 11 A. It would either be -- we have a few transaction 12 platforms. So either it would be -- the bank account 13 will show a statement based off of like a deposit. It 14 would be CashOut, PayPal. Depending on how they pay, 15 you can find a receipt or a transaction record for 16 something. 17 Q. Okay. And the same question, but just so we're 18 clear, if I wanted to know each of the expenditures that 19 The Panther Party made, for example, in advance of the 20 2018 general election, what would be the best source for 21 me to look at for that? 22 A. It would be the same ones. 23 Q. Okay. So I mean, obviously you've been 24 designated here to testify today on financial activities 25 of The Panther Party, but that's not something that</p>

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<p style="text-align: right;">Page 45</p> <p>1 you're going to remember every transaction, right?</p> <p>2 A. Correct.</p> <p>3 Q. As I understand it -- and maybe you can explain</p> <p>4 it to me better. But The Panther Party essentially has</p> <p>5 three mission areas; is that right?</p> <p>6 A. Correct.</p> <p>7 Q. And it looks like those are community</p> <p>8 development, economic development, and political</p> <p>9 engagement.</p> <p>10 A. Correct.</p> <p>11 Q. And you have talked a couple of times about</p> <p>12 committees. From reading your discovery, it appears to</p> <p>13 me that there is an executive committee for each of</p> <p>14 those areas. Is that right?</p> <p>15 A. There's a committee chair. There may be a</p> <p>16 co-chair if they choose one.</p> <p>17 Q. Okay. So let me -- help me just understand a</p> <p>18 little better the committee structure of The Panther</p> <p>19 Party.</p> <p>20 Is it one committee that has chairs from</p> <p>21 each of those areas or are there separate committees</p> <p>22 within --</p> <p>23 A. There's -- there's separate committees with a</p> <p>24 chair for each committee.</p> <p>25 Q. Okay. And in addition to the chair, how many</p>	<p style="text-align: right;">Page 47</p> <p>1 meetings. It just depends.</p> <p>2 Q. Do you -- does the organization keep a record</p> <p>3 of the meetings that it's held?</p> <p>4 A. We have some meeting minutes and agendas. Some</p> <p>5 meetings were informal. Some meetings were formal.</p> <p>6 Q. What about past calendars that show when</p> <p>7 meetings were held even if they were informal?</p> <p>8 A. Probably maybe a Google calendar or it may be</p> <p>9 like in the GroupMe. You can set a meeting date. So it</p> <p>10 just depends. It could be word of mouth.</p> <p>11 Q. So although The Panther Party meets regularly,</p> <p>12 is it fair to say that it can be variable as to when</p> <p>13 those meetings actually occur?</p> <p>14 A. Yes, because it might be a week like midterms.</p> <p>15 There won't be a meeting then.</p> <p>16 Q. Do you guys meet over the summer?</p> <p>17 A. We'll have -- like the E board have some</p> <p>18 conversations over the summer, but there won't</p> <p>19 necessarily be a general body meeting because the</p> <p>20 students aren't here.</p> <p>21 Q. Do you know roughly how many meetings The</p> <p>22 Panther Party will have over the course of a semester?</p> <p>23 A. Course of a semester? Maybe 10.</p> <p>24 Q. Your interrogatory responses say that there's</p> <p>25 no set meeting place. Is that right?</p>
<p style="text-align: right;">Page 46</p> <p>1 members sit on those committees?</p> <p>2 A. It just depends. Anybody can join a committee.</p> <p>3 Q. Do you know generally kind of a number that the</p> <p>4 committees will have?</p> <p>5 A. Somewhere between maybe five to 10.</p> <p>6 Q. Is it fair to say that the issues that we're</p> <p>7 discussing in this case, voter registration, voter</p> <p>8 drives, outreach, voting activities, fall under the</p> <p>9 political engagement component of The Panther Party's</p> <p>10 activities?</p> <p>11 A. Political engagement and community development.</p> <p>12 Q. So economic development -- the economic --</p> <p>13 economic development activities of The Panther Party</p> <p>14 don't really relate to what we're here talking about</p> <p>15 today.</p> <p>16 A. I mean, there would be some overlap, but I</p> <p>17 think the main primary ones would be political</p> <p>18 engagement and community development.</p> <p>19 Q. Does The Panther Party have regular meetings?</p> <p>20 A. Yes.</p> <p>21 Q. How often?</p> <p>22 A. Depending on whatever the E board that year</p> <p>23 wants to do their meetings. It might be weekly,</p> <p>24 biweekly. There may be a weekly -- biweekly general</p> <p>25 body meeting and then the off weeks would be E board</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Correct.</p> <p>2 Q. So as a time for a meeting comes up, you guys</p> <p>3 just look around to locate a room to use?</p> <p>4 A. We probably have a room we usually go to. Like</p> <p>5 right now we meet in the business building; but if that</p> <p>6 room is taken, then we'll find -- we'll find somewhere</p> <p>7 else.</p> <p>8 Q. Who do you work with at the university to</p> <p>9 schedule a room?</p> <p>10 A. Sometimes we just go to a room, an open room.</p> <p>11 Sometimes we'll actually go through what's called PVPaw</p> <p>12 Link, which is the platform by which -- under student</p> <p>13 engagement, by which you actually book a room. We'll</p> <p>14 mainly do that for larger events that we need to</p> <p>15 solidify a room for.</p> <p>16 Q. Are the meetings always held on campus?</p> <p>17 A. I would say yes, generally.</p> <p>18 Q. Can you think of a time where you ever met off</p> <p>19 campus?</p> <p>20 A. We maybe met at somebody's house.</p> <p>21 Q. Do you remember an occasion where that</p> <p>22 occurred?</p> <p>23 A. Not off the top of the head. But I mean, I'm</p> <p>24 pretty sure it may have happened.</p> <p>25 Q. How is the agenda for the meeting set?</p>



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<p style="text-align: right;">Page 49</p> <p>1 A. Usually the president will get with the 2 secretary and they'll look at the old business -- well, 3 the new -- the old and new business from the last 4 meeting and bring it over and then add any from anybody 5 that had any recommendations to add to the agenda and 6 then that would be pretty much it. 7 Q. How do you provide notice of the meetings to 8 the members? 9 A. Mainly GroupMe. 10 Q. What's the typical attendance in terms of 11 numbers for a general meeting? 12 A. Probably somewhere between 10 to 20. 13 Q. How long does a general meeting typically last? 14 A. If I'm over, I try to have my meetings less 15 than an hour because I don't like long meetings. 16 Q. Do the executive committees or the area 17 committees that we had talked about previously -- do 18 they have their own separate meetings? 19 A. Yes. E board has their own separate meetings. 20 Q. Does, for example, the political engagement 21 committee have its own separate meetings? 22 A. Informally they'll probably meet with their 23 committee. Sometimes we'll have it to where during the 24 general body meeting the first half will be general body 25 business and then we'll have breakout sessions for the</p>	<p style="text-align: right;">Page 51</p> <p>1 facilitator of everything. 2 Q. For example, if The Panther Party, you know, 3 wants to hold a voter registration event, can you walk 4 me through how that would take place? 5 A. It would be one of two ways. Anybody can 6 recommend a voter registration event. And then based 7 off what type of an event it is -- so if it's voter 8 registration, that's a political engagement deal, so we 9 would delegate it to that committee. But it would be a 10 whole organizational decision for the most part, but it 11 would be spearheaded by the political engagement 12 committee. 13 Q. Okay. Who would be responsible for planning 14 the event? 15 A. Pretty much for that it would be the political 16 engagement chair with the collaboration of the E board 17 to make sure you book the room or book the environment 18 at the time, whatever else you need. 19 Q. Who was the political engagement chair at the 20 time of the 2018 election? 21 A. The 2018 election political engagement chair, 22 it may have been Maydrian at that time. I believe it 23 may have been Maydrian. 24 Q. That's Maydrian Lowe? 25 A. No, no, no. I'll go back. It wasn't Maydrian.</p>
<p style="text-align: right;">Page 50</p> <p>1 committees. 2 Q. Do you know how many people there were on the 3 political engagement committee in the fall of 2018? 4 A. Probably somewhere between five and 10. 5 Q. Were you or any of the other named plaintiffs 6 in the suit on the political engagement committee in the 7 fall of '18? 8 A. I believe I was on the political engagement 9 committee. Was I president that year? I was -- I was 10 on the political engagement committee. Jayla Allen may 11 have been on the political engagement committee. 12 Q. To your recollection, Treasure Smith was not? 13 A. She may have been on the political engagement 14 committee. 15 Q. Do you know one way or the other? 16 A. No. Because you can -- you can fluctuate 17 between committees, so it's not something that's just 18 set in stone. Once you get added to the GroupMe for 19 that committee, you're pretty much like all on the 20 committee now. 21 Q. In terms of the activities of the organization, 22 are those effectively planned and operated by the 23 committees? 24 A. Yeah, most of the activity is through the 25 committees. And then the president is mostly the</p>	<p style="text-align: right;">Page 52</p> <p>1 It was -- it was filled by Antonious Brown. He was the 2 VP, but he was also acting political engagement chair. 3 I think Maydrian came later. 4 Q. When The Panther Party or the political 5 engagement committee holds an event such as a voter 6 registration event, are members assigned to be there to 7 participate in it? 8 A. They're encouraged. 9 Q. Okay. Is it on a voluntary basis? 10 A. Yeah. 11 Q. So there's no requirement, for example, for 12 purposes of maintaining membership, that you attend an 13 event. 14 A. Not necessarily. 15 Q. What do you -- what do you mean "not 16 necessarily"? 17 A. There's no like set rule that if you don't come 18 to an event, we're going to kick you out. 19 Q. Okay. Has anybody ever been dismissed, I 20 guess, from the organization based on nonparticipation? 21 A. No. 22 Q. You were the president in November of 2017? 23 A. I believe that's correct. 24 Q. There was an election in November of 2017; is 25 that right?</p>



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<p style="text-align: right;">Page 53</p> <p>1 A. Yes.</p> <p>2 Q. Do you happen to remember the subject of that</p> <p>3 election?</p> <p>4 A. No.</p> <p>5 Q. If I told you there was a constitutional</p> <p>6 amendment election for the State constitution, does that</p> <p>7 ring any bells?</p> <p>8 A. That sounds like it may ring a bell.</p> <p>9 Q. Okay. There was also a bond election in</p> <p>10 November of 2017. Do you remember that?</p> <p>11 A. I remember the bond election.</p> <p>12 Q. I believe it was a jail bond election?</p> <p>13 A. Yes.</p> <p>14 Q. All right. What political engagement</p> <p>15 activities, if any, did The Panther Party undertake in</p> <p>16 relation to that 2017 general election?</p> <p>17 A. I remember we went to spread some information.</p> <p>18 We did a forum on campus about it. I believe some</p> <p>19 students went to a meeting about it for more information</p> <p>20 in that same semester.</p> <p>21 Q. The forum that you did, was that in conjunction</p> <p>22 with some other student groups?</p> <p>23 A. Yes.</p> <p>24 Q. Was that something that The Panther Party paid</p> <p>25 for?</p>	<p style="text-align: right;">Page 55</p> <p>1 A. Waller County officials. I believe Judge Trey</p> <p>2 Duhon was there and some other people, maybe Jeron</p> <p>3 Barnett, Commissioner Barnett.</p> <p>4 Q. Do you remember whether in 2017 The Panther</p> <p>5 Party did any voter registration events for the November</p> <p>6 2017 election?</p> <p>7 A. I believe we did. We always -- if there's a</p> <p>8 voting election around, we probably did a voter</p> <p>9 registration event.</p> <p>10 Q. Okay. And when The Panther Party does a voter</p> <p>11 registration event, that's something wherein you'll</p> <p>12 apply for funds from the university?</p> <p>13 A. No. We probably don't need funds. It will</p> <p>14 probably be between just people volunteering their time.</p> <p>15 It may be a collaboration with another organization.</p> <p>16 But pretty much we don't really come out of pocket for</p> <p>17 those things. We don't have to, unless we're buying</p> <p>18 food or something, but we don't do that all the time.</p> <p>19 Q. Is it fair to say that you only buy food when</p> <p>20 you've gotten a donation to cover it?</p> <p>21 A. No. Sometimes we buy food if we just have some</p> <p>22 money and we want to have some food there to attract</p> <p>23 students because, you know, we like to eat.</p> <p>24 Q. I remember that.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 54</p> <p>1 A. No.</p> <p>2 Q. Did any of The Panther Party members present at</p> <p>3 that forum to your recollection?</p> <p>4 A. We might -- I think I might have spoke at it or</p> <p>5 did some introductions, things like that.</p> <p>6 Q. You said you thought -- what was the purpose of</p> <p>7 that forum?</p> <p>8 A. Educational.</p> <p>9 Q. Who attend -- who was it presented to?</p> <p>10 A. Student body, community members, pretty much</p> <p>11 open to the public, anybody who was interested.</p> <p>12 Q. Where was it held?</p> <p>13 A. It was on campus in the Juvenile Justice</p> <p>14 Building.</p> <p>15 Q. And you said that you also thought that some of</p> <p>16 your members may have gone to a meeting to get more</p> <p>17 information?</p> <p>18 A. Yes.</p> <p>19 Q. What meeting are you referring to?</p> <p>20 A. It was an informational about the bail bond --</p> <p>21 not the bail bond. The bond.</p> <p>22 Q. The jail bond?</p> <p>23 A. The jail bond.</p> <p>24 Q. Who was presenting or putting on that meeting,</p> <p>25 if you recall?</p>	<p style="text-align: right;">Page 56</p> <p>1 MS. ADEN: Universal.</p> <p>2 MR. SEAQUIST: That's right.</p> <p>3 Q. (BY MR. SEAQUIST) Are you doing okay?</p> <p>4 A. I'm good.</p> <p>5 Q. Okay. In conducting voter registration events,</p> <p>6 you talked a little bit about it in terms of Panther</p> <p>7 Party members volunteering; but what specifically does</p> <p>8 The Panther Party do at its voter registration events?</p> <p>9 What does that look like?</p> <p>10 A. We'll get a table, post up somewhere, have the</p> <p>11 forms that we get from Waller County and, you know, get</p> <p>12 people to fill them out. We'll get deputized before</p> <p>13 that. Members will get deputized before that so they</p> <p>14 can be the ones to register people.</p> <p>15 Q. How do your members get deputized?</p> <p>16 A. Waller County has hosted different deputizing</p> <p>17 events on campus.</p> <p>18 Q. And do you know generally who presents those</p> <p>19 events?</p> <p>20 A. No. I mean, it would be the -- somebody in the</p> <p>21 elections office, but it would be different people.</p> <p>22 Q. Do you -- does The Panther Party work in</p> <p>23 connection with any other groups when it provides voter</p> <p>24 registration events?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 57</p> <p>1 Q. And who are those?</p> <p>2 A. There's a lot of them. The SGA, the NAACP.</p> <p>3 There's a lot.</p> <p>4 Q. Do you also work with the county elections</p> <p>5 office?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know the current election -- do you know</p> <p>8 who the current elections administrator is?</p> <p>9 A. Is it Christy Eason?</p> <p>10 Q. Yes. Do you know Ms. Eason?</p> <p>11 A. Not personally. I've had two conversations</p> <p>12 with her.</p> <p>13 Q. Have you personally attended any of the -- of</p> <p>14 Ms. Eason's presentations for training deputy</p> <p>15 registrars?</p> <p>16 A. I've attended some. I don't know if she was</p> <p>17 the one that was over it. But I've been to one for the</p> <p>18 elections office.</p> <p>19 Q. Has the County consistently sent someone from</p> <p>20 the elections office out to Prairie View to conduct</p> <p>21 registration training?</p> <p>22 A. Yes, mainly based -- either they will come or</p> <p>23 based off our request.</p> <p>24 Q. And to your knowledge, members of The Panther</p> <p>25 Party have taken that deputy registrar training.</p>	<p style="text-align: right;">Page 59</p> <p>1 A. I may have been to one or a few. I'm not</p> <p>2 totally sure of the exact one. I think I've been there</p> <p>3 before, though.</p> <p>4 Q. Okay. Do you remember specifically going as it</p> <p>5 relates to the November 2017 election?</p> <p>6 A. No. I think I -- it might have just been a</p> <p>7 general meeting about something else and I just wanted</p> <p>8 to be informed.</p> <p>9 Q. Okay. How often -- well, how many</p> <p>10 Commissioners Court meetings would you say you've been</p> <p>11 to?</p> <p>12 A. Me personally? It would be less than a</p> <p>13 handful. As an organization, I know members of the</p> <p>14 organization have been there.</p> <p>15 Q. And the Commissioners Court meets at the county</p> <p>16 courthouse, correct?</p> <p>17 A. Yes.</p> <p>18 Q. In Hempstead?</p> <p>19 When you were a student on campus, did you</p> <p>20 have a vehicle?</p> <p>21 A. I did.</p> <p>22 Q. Do you know -- well, did The Panther Party talk</p> <p>23 to or otherwise communicate with any officials or</p> <p>24 employees of Waller County in advance of the 2017</p> <p>25 election?</p>
<p style="text-align: right;">Page 58</p> <p>1 A. Yes.</p> <p>2 Q. Other than the registration drive and the forum</p> <p>3 we discussed, did The Panther Party engage in any other</p> <p>4 political engagement activities for the 2017 jail bond</p> <p>5 election?</p> <p>6 A. No. Voter registration, community forums,</p> <p>7 general information. That's pretty much the main things</p> <p>8 we do.</p> <p>9 Q. When you say "general information," how does</p> <p>10 The Panther Party disseminate general information?</p> <p>11 A. Social media, GroupMe, flyers, mouth to -- what</p> <p>12 is it? Mouth -- mouth -- what am I saying? Mouth to --</p> <p>13 MS. ADEN: Word of?</p> <p>14 THE WITNESS: Word of mouth.</p> <p>15 MS. ADEN: Sorry.</p> <p>16 MR. SEAQUIST: That's all right. Team</p> <p>17 effort.</p> <p>18 MS. ADEN: That one I knew.</p> <p>19 THE WITNESS: I'm thinking of something</p> <p>20 else.</p> <p>21 Q. (BY MR. SEAQUIST) To your recollection, did you</p> <p>22 or -- well, as a representative of The Panther Party,</p> <p>23 did you or any other members of The Panther Party attend</p> <p>24 any meetings of the Waller County Commissioners Court in</p> <p>25 advance of the November 2017 election?</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Say that again.</p> <p>2 Q. Sure.</p> <p>3 Did The Panther Party -- and again, I'm</p> <p>4 asking you as the representative -- have any formal</p> <p>5 communications with any employees or officials of Waller</p> <p>6 County?</p> <p>7 A. What do you mean by formal? What do you mean</p> <p>8 by that?</p> <p>9 Q. Well, on behalf of the organization.</p> <p>10 A. I believe so.</p> <p>11 Q. Okay. What do you remember about that?</p> <p>12 A. I mean, I believe we probably reached out to</p> <p>13 Christy Eason. We probably talked to some of the</p> <p>14 Commissioners.</p> <p>15 Q. About the 2017 election?</p> <p>16 A. 2017 election?</p> <p>17 Q. Yeah.</p> <p>18 A. That's kind of far back. I really don't</p> <p>19 remember if there was any specific -- the specific</p> <p>20 conversation. But I'm pretty sure we're always in the</p> <p>21 loop somehow, so --</p> <p>22 Q. Okay. To your recollection -- well, let me ask</p> <p>23 you this. Do you know whether The Panther Party</p> <p>24 advocated for any additional voting locations in Waller</p> <p>25 County for the November 2017 election?</p>

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<p style="text-align: right;">Page 61</p> <p>1 A. I believe that issue came up. I'm not sure. 2 It probably wasn't the same issue that was in the last 3 election. But I believe the issue did come up and we 4 did want early voting. I believe we might have had it. 5 Q. Okay. You don't remember any particular issues 6 around early voting as it related to the 2017 election. 7 A. Not any particular issues, but I will say that 8 pretty much every election there's always an issue 9 around voting, access to voting, especially on campus. 10 So I believe -- there was -- there was something -- I'm 11 just not sure what it was at this time -- in 2017. 12 Q. Do you -- have you met the local chair of the 13 Waller County Democratic party, Rosa Harris? 14 A. Yeah, I've had a few conversations with her. 15 Q. What conversations were those? 16 A. I believe we had a conversation about doing 17 some forums at Prairie View. That's pretty much it. I 18 haven't had a lot of conversations with her. 19 Q. You said some forms? 20 A. Yeah, like candidate forums. 21 Q. Oh, forums. 22 A. Yeah, forums. 23 Q. Okay. And so that would have been 24 conversations with Ms. Harris in her role as the 25 Democratic party chair in terms of scheduling or</p>	<p style="text-align: right;">Page 63</p> <p>1 have to go to a print shop or anything. You can just 2 use the facility resources available to the students 3 here? 4 A. Yeah. We still pay for them off of our -- our 5 tuition. We have like a set cost that we can use up to. 6 Q. Do you know what that is? 7 A. I couldn't tell you off the top. 8 Q. Is there -- does the university issue some kind 9 of a copy card or an identifier number or something that 10 you have to punch in when you're going to print 11 something? 12 A. You swipe your student ID. 13 Q. Okay. So it's tracked through your student ID? 14 A. Yes. 15 Q. And your tuition includes a certain amount of 16 copying costs? 17 A. Yes. 18 Q. What happens if you exceed that amount? 19 A. Then you can't print anymore or you may -- I've 20 never had to do it, but I think you -- you probably can 21 add more onto there; but once you exceed that amount, 22 you're pretty much done for the semester. 23 Q. Okay. So it's not like they send you a bill or 24 anything. It just cuts off; and then if you want more, 25 you have to take some action.</p>
<p style="text-align: right;">Page 62</p> <p>1 organizing candidates to come speak at Prairie View? 2 A. Yes. 3 Q. How -- what is your practice -- well, what is 4 The Panther Party's practice in terms of how it learns 5 of what the voting schedule is going to be? 6 A. We might check online, word of mouth, different 7 avenues. 8 Q. Once The Panther Party learns of the voting 9 schedule, do you post those hours on social media? 10 A. Yes. 11 Q. Any other ways that you disseminate that 12 information? 13 A. Word of mouth, GroupMe, maybe post up flyers. 14 Q. Do you -- where do you have your flyers 15 printed? 16 A. On -- on campus, the library, different -- 17 different printers on campus. 18 Q. Is it -- is that something that The Panther 19 Party does in advance of every election? 20 A. We've used that before. 21 Q. So that's a typical activity that The Panther 22 Party would engage in? 23 A. To some extent. If we don't have to use 24 flyers, we might just use social media. 25 Q. When you say a printer on campus, so you don't</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Technically, you prepay for it. 2 MR. SEAQUIST: Let's take a quick break. 3 THE WITNESS: Cool. 4 (Recess from 10:23 a.m. to 10:30 a.m.) 5 Q. (BY MR. SEAQUIST) Okay. Mr. Muhammad, we are 6 back on the record after a short break. Is there 7 anything in the testimony so far that we need to go back 8 and readdress or are we good to go? 9 A. No, I'm -- well, one thing. I remember you 10 asked me about my transportation. I just wanted to make 11 it clear that I'm speaking as a representative of The 12 Panther Party; so even though like I had transportation, 13 other people didn't, because that was more like a 14 personal direct question. I think that was outside of 15 me as representative of The Panther Party. 16 Q. I understand. So you had a car personally. 17 Obviously The Panther Party doesn't own its own 18 commercial vehicles or anything. 19 A. Correct. 20 Q. Okay. Anything else? 21 A. No. I just wanted to -- that's the only thing 22 I can think of. 23 Q. I want to clear up a couple of things just so 24 the record is clear. 25 You said -- a few times in the deposition</p>

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<p>1 you've referred to the E board. The E board, if I 2 understand correctly, is the board of directors for the 3 nonprofit? 4 A. No. 5 Q. Okay. Tell me who the E board is. 6 A. The E board is the executive board for mainly 7 the student organization. The board of directors is 8 more there for formality sake, but the E board actually 9 governs the -- the activity of The Panther Party. 10 Q. Okay. Is the board -- is the E board the 11 same -- is the makeup of the E board the same as the 12 board of directors for the nonprofit? 13 A. No. E board would just be three board of 14 directors. 15 Q. Okay. And again, the board of directors is you 16 and who else? 17 A. Board of directors, I believe, listed with the 18 State would be me. Ervin Bryant is on there. And I 19 believe Dominique Roy, who's a member of The Panther 20 Party, is on the -- is on the board of directors or 21 listed as a board of director. 22 Q. And the last name was -- 23 A. Roy, R-o-w -- R-o-y. 24 Q. Okay. And those are the same members as the E 25 board; is that right?</p>	<p>1 A. Yes. 2 Q. Okay. Where was that meeting? 3 A. It was at the Waller County Community Center. 4 Q. And what other members of The Panther Party 5 attended that meeting to your recollection? 6 A. It may have been Kirsten Budwine, who was a 7 community development chair at that time, but she was 8 also in SGA, so they were there in more than one 9 capacity. I believe Ervin Bryant was there, Antonious 10 Brown. There may have been some other members. But 11 like I said, they were there as The Panther Party but 12 also in other capacities, too. 13 Q. Okay. Do you remember how you got to the 14 meeting? 15 A. I drove to the meeting. 16 Q. Did anybody else, to your recollection, get 17 there in a manner other than driving? 18 A. I believe everybody drove. 19 Q. Okay. Did you vote in the 2017 general 20 election, the jail bond election? 21 A. I believe I did. 22 Q. Do you know whether you voted early or on 23 election day? 24 A. I believe I voted early. 25 Q. Did you have any problems casting a ballot in</p>
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<p>1 A. Well, Ervin Bryant was a member of The Panther 2 Party and then Dominique Roy is a current member of The 3 Panther Party. 4 Q. Okay. But I guess just so it's clear -- and 5 I've probably made this more complicated than it needs 6 to be. I just want to make sure that the people who are 7 on the E board are the same as the board of directors 8 for the nonprofit. 9 A. Some are. No, it's not. 10 Q. Okay. 11 A. So like Tajaun isn't on the board of directors. 12 He's not listed as a board of director of The Panther 13 Party. 14 Q. Okay. But he is as the president on the E 15 board? 16 A. He is the president of the E board. 17 Q. I got you. Okay. Thank you for that. 18 A. No problem. 19 Q. We had also -- in your testimony earlier, you 20 had talked about an informational meeting that some 21 students had gone -- or some members of The Panther 22 Party had gone to in regard to the jail bond. Do you 23 remember that testimony? 24 A. Yes. 25 Q. Did you personally attend that meeting?</p>	<p>1 that election? 2 A. I wouldn't say so, me personally, no. 3 Q. Okay. Were you aware of any members of The 4 Panther Party that had any difficulties casting a ballot 5 in the 2017 jail bond election? 6 A. I mean, there's always an issue. I couldn't 7 just pick a direct one. But there's always something 8 every year. 9 Q. But you can't specify any particular difficulty 10 that anybody had voting in the 2017 election? 11 A. It would be things in regards to how to file -- 12 how to register, like the address. We have a very funny 13 address issue when it comes to our zip code. That would 14 be something that may have came up. I'm not sure of the 15 schedule for early voting that year. But it's some -- 16 some of those -- those are some of the issues that may 17 come up or come up usually every year to different 18 levels. 19 Q. But you don't know specifically whether those 20 were particular -- or whether those came up in regard to 21 the 2017 election. 22 A. No. 23 Q. Okay. 24 All right. Did you vote in the 2018 25 primary?</p>

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<p style="text-align: right;">Page 69</p> <p>1 A. Yes.</p> <p>2 Q. And was that -- did you vote in the Democrat or</p> <p>3 the Republican primary?</p> <p>4 A. I believe I voted in the Democratic.</p> <p>5 Q. Do you identify as a Democrat?</p> <p>6 A. No.</p> <p>7 Q. Are you a member of the Democratic party?</p> <p>8 A. No.</p> <p>9 Q. Are you affiliated with any local Democratic</p> <p>10 party groups?</p> <p>11 A. When you say "affiliated," what do you mean?</p> <p>12 Q. Well, do you attend the meetings of any local</p> <p>13 Democratic party groups?</p> <p>14 A. No.</p> <p>15 Q. Have you donated to any local Democratic party</p> <p>16 groups?</p> <p>17 A. No.</p> <p>18 Q. All right. Have you worked with any local</p> <p>19 Democratic party groups to hold or host events?</p> <p>20 A. Yes. I believe I talked about earlier where we</p> <p>21 had forums on campus, but it wasn't a Democratic event.</p> <p>22 It was nonpartisan.</p> <p>23 Q. Okay. So I guess my question then is: Are</p> <p>24 there any local Democratic party groups that The Panther</p> <p>25 Party has worked with in terms of holding events, if you</p>	<p style="text-align: right;">Page 71</p> <p>1 A. Yeah, it's pretty much the same.</p> <p>2 Q. You had said -- well, you mentioned a forum.</p> <p>3 Do you remember specifically holding a forum in advance</p> <p>4 of the 2018 primary?</p> <p>5 A. I believe we did. I'm not sure for what</p> <p>6 office, but I believe we did hold a forum.</p> <p>7 Q. Okay. So can you tell me the nature of that</p> <p>8 forum at all?</p> <p>9 A. Some candidates came down to talk about their</p> <p>10 agenda or platform.</p> <p>11 Q. And is that something that The Panther Party</p> <p>12 did on its own?</p> <p>13 A. No. That was a collaboration. Usually -- I'm</p> <p>14 not sure which one, but usually it's a collaboration</p> <p>15 between maybe SGA. Maybe juvenile justice will host it.</p> <p>16 It just depends. Juvenile justice does something called</p> <p>17 the Gavel Series and we usually help out with the Gavel</p> <p>18 Series and that -- like the forum was following that.</p> <p>19 So it would be one of those. We did multiple of those,</p> <p>20 especially in my tenure here at Prairie View.</p> <p>21 Q. When you say you'll help out or The Panther</p> <p>22 Party will help out, what do you mean by helping out?</p> <p>23 A. Cohost, help get students there, help -- yeah,</p> <p>24 pretty much.</p> <p>25 Q. So publicize it essentially?</p>
<p style="text-align: right;">Page 70</p> <p>1 know?</p> <p>2 A. Like a Democratic event?</p> <p>3 Q. Uh-huh.</p> <p>4 A. No. We're nonpartisan.</p> <p>5 Q. Is there a student Democratic group on campus?</p> <p>6 A. I believe so.</p> <p>7 Q. Have you worked with any of those groups in</p> <p>8 holding voter registration drives, get out the vote</p> <p>9 events, anything like that?</p> <p>10 A. Yes. We probably -- I think we collabbed with</p> <p>11 Young Democrats. I think that's what they're called.</p> <p>12 Q. Did The Panther Party support any particular</p> <p>13 candidates in the 2018 primary?</p> <p>14 A. No. We don't endorse candidates.</p> <p>15 Q. Did The Panther Party campaign?</p> <p>16 A. No, we don't -- campaign for a candidate? No.</p> <p>17 Q. For a candidate in the 2018 primary.</p> <p>18 A. No.</p> <p>19 Q. What political engagement activities did The</p> <p>20 Panther Party undertake in relation to the 2018 primary</p> <p>21 election?</p> <p>22 A. Voter registration and education forums.</p> <p>23 Q. So the voter registration event, is that the</p> <p>24 same thing as we talked about earlier where you'll get a</p> <p>25 table and have registration forms available?</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Publicize it and cohost it.</p> <p>2 Q. Okay. The -- again, the forum is not something</p> <p>3 that The Panther Party would make a financial</p> <p>4 contribution to.</p> <p>5 A. No.</p> <p>6 Q. You talked a little bit about education. In</p> <p>7 regard to the 2018 primary, did The Panther Party hold</p> <p>8 any education events or activities that were separate</p> <p>9 from either the forum we discussed or like the voter</p> <p>10 registration events that we discussed?</p> <p>11 A. I would say yes, there would have been some,</p> <p>12 but it's probably just more just spreading general</p> <p>13 information.</p> <p>14 Q. And when you say "spreading general</p> <p>15 information," you're talking about social media posts?</p> <p>16 A. Yeah, social media posts, again, word of mouth,</p> <p>17 having conversations in the GroupMe about what's going</p> <p>18 on.</p> <p>19 Q. So not necessarily a formal physical meeting.</p> <p>20 A. Not necessarily, no.</p> <p>21 Q. And then we mentioned that The Panther Party</p> <p>22 hosted the voter-only party in April of 2018.</p> <p>23 A. Uh-huh.</p> <p>24 Q. Do you remember attending any meetings of the</p> <p>25 Waller County Commissioners Court in advance of the 2018</p>



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<p style="text-align: right;">Page 73</p> <p>1 primary?</p> <p>2 A. Not off the top, no.</p> <p>3 Q. Do you know if any other Panther Party members</p> <p>4 did?</p> <p>5 A. I wouldn't be able to say that.</p> <p>6 Q. Do you know whether The Panther Party -- well,</p> <p>7 do it this way. Did you talk to or otherwise</p> <p>8 communicate with any officials or employees of Waller</p> <p>9 County in advance of the 2018 primary?</p> <p>10 A. I believe I did talk to them, talk to at least</p> <p>11 one official. I don't know who it was, though. But I</p> <p>12 mean, I'm pretty sure I talked to somebody.</p> <p>13 Q. Okay. And what was the substance of that</p> <p>14 discussion?</p> <p>15 A. I don't know.</p> <p>16 Q. You can't say specifically what it was about?</p> <p>17 A. No. I don't know. It was awhile ago. I talk</p> <p>18 to people in Waller County all the time.</p> <p>19 Q. Okay. And by "people in Waller County," do you</p> <p>20 mean, you know, members of the Waller County government?</p> <p>21 A. Everybody from the Commissioners Court down to</p> <p>22 constables I've had some manner of conversation with.</p> <p>23 Q. Okay.</p> <p>24 A. I know I talked to Sheriff Smith at the bond</p> <p>25 information over at Waller County Community Center. I</p>	<p style="text-align: right;">Page 75</p> <p>1 we had enough days on the schedule once we got the</p> <p>2 schedule, making sure it was fair compared to different</p> <p>3 schedules across Waller County.</p> <p>4 Q. And did you go to any Commissioners Court</p> <p>5 meetings to advocate for additional hours?</p> <p>6 A. No, not in that --</p> <p>7 Q. And we're talking about the primary.</p> <p>8 A. Yeah, not at the primary.</p> <p>9 Q. Okay. And you testified earlier that you had</p> <p>10 voted in the primary. Did you vote early or on election</p> <p>11 day of the primary?</p> <p>12 A. I believe I voted early in the primary.</p> <p>13 Q. And where did you cast your ballot, sir?</p> <p>14 A. I believe it was at the university.</p> <p>15 Q. The student center?</p> <p>16 A. Yes.</p> <p>17 Q. I know it's been a little while; but for the</p> <p>18 2018 primary, can you remember what time of day you</p> <p>19 voted?</p> <p>20 A. Sometime between 7:00 and 7:00, so --</p> <p>21 Q. Okay. Do you remember how you got to the</p> <p>22 polling location?</p> <p>23 A. It was on campus. I probably walked. Well, I</p> <p>24 drove to campus and then I probably walked to the MSC</p> <p>25 from wherever I was on campus.</p>
<p style="text-align: right;">Page 74</p> <p>1 talked to -- Judge Duhon was there, so I know I had</p> <p>2 conversations there. But I mean, that's pretty much</p> <p>3 anything I can think of specifically.</p> <p>4 Q. To your knowledge, do other -- have other</p> <p>5 members of The Panther Party also engaged in</p> <p>6 conversations about their concerns and interests with</p> <p>7 members of the Waller County government?</p> <p>8 A. Yes. We do that a lot.</p> <p>9 Q. Do you remember any -- or did The Panther Party</p> <p>10 engage in any specific advocacy as it related to early</p> <p>11 voting in the 2018 primary?</p> <p>12 A. Yes.</p> <p>13 Q. What do you recall The Panther Party doing in</p> <p>14 regard to early voting for the 2018 primary?</p> <p>15 A. Get out the vote drives. I believe the voters</p> <p>16 party was a part of that. We have -- pretty much</p> <p>17 letting people know what the voting schedule is for that</p> <p>18 primary.</p> <p>19 Q. Did The Panther Party, to your recollection,</p> <p>20 have or express any concerns about the early voting</p> <p>21 schedule for the 2018 primary?</p> <p>22 A. I would say we did.</p> <p>23 Q. Okay. What were those concerns?</p> <p>24 A. I'm not sure totally, but I'm pretty sure it</p> <p>25 was either we wanted the schedule -- it was making sure</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. In 2018 were you living on campus?</p> <p>2 A. No. I only lived on campus in summer of 2018.</p> <p>3 Q. So for the fall of twenty -- well, for the</p> <p>4 spring of 2018 you were living off campus?</p> <p>5 A. Correct.</p> <p>6 Q. How far?</p> <p>7 A. About a mile, on the other side of 290, across</p> <p>8 the street from Dollar General.</p> <p>9 Q. Was that a house?</p> <p>10 A. Yes.</p> <p>11 Q. Do you remember how long it took you to vote in</p> <p>12 the 2018 primary?</p> <p>13 A. I don't think it was that long in the 2018</p> <p>14 primary.</p> <p>15 Q. You don't remember any particular problems with</p> <p>16 lines or anything like that?</p> <p>17 A. Not for that primary.</p> <p>18 Q. Did The Panther Party support any particular</p> <p>19 candidates in the 2018 November election?</p> <p>20 A. No. We don't support candidates.</p> <p>21 Q. Did you support -- did The Panther Party</p> <p>22 support a particular party?</p> <p>23 A. No. We supported The Panther Party.</p> <p>24 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>25 6.</p>



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<p style="text-align: right;">Page 77</p> <p>1 (Exhibit No. 6 marked)</p> <p>2 Q. (BY MR. SEAQUIST) Do you recognize what I've</p> <p>3 handed you to be Exhibit 6?</p> <p>4 A. Yes.</p> <p>5 Q. The Panther Party has a Twitter account; is</p> <p>6 that correct?</p> <p>7 A. Correct.</p> <p>8 Q. And on occasion, The Panther Party will retweet</p> <p>9 tweets from other students?</p> <p>10 A. Yes.</p> <p>11 Q. And this is a tweet that The Panther Party has</p> <p>12 retweeted?</p> <p>13 A. Yes.</p> <p>14 Q. And it's from Maydrian Lowe?</p> <p>15 A. Yes.</p> <p>16 Q. And Maydrian Lowe is also a member of The</p> <p>17 Panther Party, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And in the 2018 election, was he the</p> <p>20 vice-president at that point of the E board?</p> <p>21 A. In the 2018 election?</p> <p>22 Q. Yes, the general.</p> <p>23 A. No.</p> <p>24 Q. Was he in any other leadership role at that</p> <p>25 time?</p>	<p style="text-align: right;">Page 79</p> <p>1 A. What do you mean sent out to us? We probably</p> <p>2 came across it, probably shared it in our GroupMe.</p> <p>3 Q. Okay. And so it would have been possible for</p> <p>4 The Panther Party just to share the flyer by itself,</p> <p>5 correct?</p> <p>6 A. It would have been possible.</p> <p>7 Q. Other than Twitter, what social media apps does</p> <p>8 The Panther Party use, if any?</p> <p>9 A. Instagram. We have a Facebook, but mostly</p> <p>10 Instagram is -- Facebook is an older demographic, so</p> <p>11 mainly Instagram and Twitter.</p> <p>12 Q. Do you know how many Twitter followers The</p> <p>13 Panther Party has?</p> <p>14 A. I'd have to look at it. I think it's somewhere</p> <p>15 between two and three hundred.</p> <p>16 Q. Do you know how many Instagram followers The</p> <p>17 Panther Party --</p> <p>18 A. Probably in the same ballpark.</p> <p>19 Q. And how does The Panther Party use social</p> <p>20 media?</p> <p>21 A. We post messages, post flyers, tweet. We tweet</p> <p>22 things we find interesting.</p> <p>23 Q. So notice of events?</p> <p>24 A. Yes.</p> <p>25 Q. Do you use it to notify your followers of</p>
<p style="text-align: right;">Page 78</p> <p>1 A. He may have been -- he may have just been on a</p> <p>2 committee.</p> <p>3 Q. Okay. Do you know whether he was on the</p> <p>4 political engagement committee?</p> <p>5 A. I believe he was on the political engagement</p> <p>6 committee.</p> <p>7 Q. And so Mr. Lowe here is saying "When people ask</p> <p>8 us about the 2018 election, let's tell them about what</p> <p>9 we did to elect Democrats up and down the ballot,"</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. And The Panther Party retweeted that message?</p> <p>13 A. We did. We retweeted it to support mainly the</p> <p>14 Parade of Voters.</p> <p>15 Q. But you retweeted the entire message, correct?</p> <p>16 A. You can't retweet part of a message, so yes.</p> <p>17 Q. Is this Parade of Voters -- is that a flyer</p> <p>18 that The Panther Party created?</p> <p>19 A. No, we didn't create this flyer.</p> <p>20 Q. Do you know who did?</p> <p>21 A. By the looks of it, it's black and gold, so I</p> <p>22 would say the fraternity Alpha Phi Alpha had something</p> <p>23 to do with it, but there's no organization on here.</p> <p>24 Q. And would this flyer have been sent out to The</p> <p>25 Panther Party?</p>	<p style="text-align: right;">Page 80</p> <p>1 voting hours?</p> <p>2 A. Yes.</p> <p>3 Q. Is it fair to say The Panther Party wants its</p> <p>4 members and followers to be as informed as possible</p> <p>5 about the opportunity for them to cast a ballot?</p> <p>6 A. I would say so, yes.</p> <p>7 Q. Do you -- The Panther Party, through those</p> <p>8 social media accounts, do you follow any of the County's</p> <p>9 social media?</p> <p>10 A. We may.</p> <p>11 Q. Do you know whether you follow the Facebook</p> <p>12 page?</p> <p>13 A. I wouldn't know off the top.</p> <p>14 Q. What about the Twitter account?</p> <p>15 A. I wouldn't know off the top.</p> <p>16 Q. To your knowledge, has The Panther Party ever</p> <p>17 retweeted or reposted any of the County's social media</p> <p>18 posts in regard to an election?</p> <p>19 A. Their posts?</p> <p>20 Q. Uh-huh.</p> <p>21 A. I mean, if they were on Twitter and we came</p> <p>22 across it, we may have; but I don't know how active they</p> <p>23 are on Twitter.</p> <p>24 Q. For example, when the County puts out social</p> <p>25 media posts with voting hours, is that something that</p>

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<p style="text-align: right;">Page 81</p> <p>1 The Panther Party has ever reshared to its members?</p> <p>2 A. Probably so, in some capacity.</p> <p>3 Q. Do you know whether that happened in the 2018</p> <p>4 general election?</p> <p>5 A. No, I don't know if that happened or not.</p> <p>6 Q. I had asked you earlier if The Panther Party</p> <p>7 met over the summer and you said the E board might have</p> <p>8 some discussions over the summer. Is that fair?</p> <p>9 A. Yes.</p> <p>10 Q. Did you -- I think you just testified you lived</p> <p>11 in Prairie View over the summer?</p> <p>12 A. I lived in Prairie View one summer, for two</p> <p>13 thousand -- summer of 2018.</p> <p>14 Q. Were you taking classes over the summer or were</p> <p>15 you just living here?</p> <p>16 A. I took classes and lived here.</p> <p>17 Q. To your knowledge, were there any other members</p> <p>18 of The Panther Party who stayed in Prairie View over the</p> <p>19 summer to take summer classes in the summer of 2018?</p> <p>20 A. Summer of 2018? I believe there were.</p> <p>21 Q. It's not uncommon for Prairie View A&amp;M students</p> <p>22 to take summer classes, right?</p> <p>23 A. It's not uncommon.</p> <p>24 Q. When does The Panther Party officially start</p> <p>25 meeting again for the new school year?</p>	<p style="text-align: right;">Page 83</p> <p>1 adopted by the -- or created by Panther Party?</p> <p>2 A. It was a campaign, correct.</p> <p>3 Q. What was the origin of that campaign?</p> <p>4 A. The origin of the campaign was started between</p> <p>5 me and Ervin Bryant. Well, we were the president and</p> <p>6 vice-president. When you say -- by "origin," how in</p> <p>7 depth do you mean, the origin of it?</p> <p>8 Q. Just -- yes. What -- was there a particular</p> <p>9 initiative, I guess, that that campaign came -- or that</p> <p>10 slogan came out of?</p> <p>11 A. So Trump during that time had MAGA, Make</p> <p>12 America Great Again, so we remixed it to fit Prairie</p> <p>13 View, Make Prairie View Great Again. But it was really</p> <p>14 about recapturing elements of Prairie View's history,</p> <p>15 about which it had a lot of success in independence in</p> <p>16 our hundred and I believe -- is it fifty now?</p> <p>17 Hundred -- or forty-year history. So really just</p> <p>18 recapture elements of our history that we believe were</p> <p>19 great.</p> <p>20 Q. Okay. Was it typical of The Panther Party to</p> <p>21 send kind of a welcome back tweet or message to incoming</p> <p>22 students to encourage them to get engaged?</p> <p>23 A. If we think about it, yes.</p> <p>24 Q. Now, in 2018 were you a senior?</p> <p>25 A. Probably super senior maybe.</p>
<p style="text-align: right;">Page 82</p> <p>1 A. Officially we start after the 12th class day.</p> <p>2 That's when you can technically start having meetings.</p> <p>3 Q. The 12th class day?</p> <p>4 A. Yeah, 12th class day of each semester.</p> <p>5 Q. Does The Panther Party wait until after the</p> <p>6 12th class day to disseminate information through social</p> <p>7 media?</p> <p>8 A. No.</p> <p>9 Q. That's something that The Panther Party does</p> <p>10 all along, correct?</p> <p>11 A. Yes.</p> <p>12 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>13 7.</p> <p>14 (Exhibit No. 7 marked)</p> <p>15 Q. (BY MR. SEAQUIST) Mr. Muhammad, do you</p> <p>16 recognize what I've shown you as Exhibit 7 to your</p> <p>17 deposition?</p> <p>18 A. It looks like a tweet from our Twitter account.</p> <p>19 Q. Okay. And what does this tweet -- can you read</p> <p>20 the tweet into the record, please?</p> <p>21 A. The tweet says, from The Panther Party, "The</p> <p>22 Panther Party would like to welcome #PV20" -- #PV22 to</p> <p>23 campus. Let's get engaged! #TheHill is in your hands!</p> <p>24 #MPVGA," which stands for Make Prairie View Great Again.</p> <p>25 Q. Is Make Prairie View Great Again a slogan</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Nothing wrong with that.</p> <p>2 You had been on campus since roughly 2014?</p> <p>3 A. Yes.</p> <p>4 Q. So you had been through several election cycles</p> <p>5 in Prairie View at that point.</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And you were aware that the Waller</p> <p>8 County Commissioners Court was responsible for setting</p> <p>9 early and election day polling locations and times,</p> <p>10 right?</p> <p>11 A. No, not since -- since I've been here, no.</p> <p>12 Q. Are you aware of any other way those times have</p> <p>13 been set since you've been here?</p> <p>14 A. I mean, I really didn't know that until</p> <p>15 probably these last two years. When I first got here, I</p> <p>16 wasn't aware of the structure of the meeting with the</p> <p>17 chairs of the parties and going over it. I wasn't aware</p> <p>18 of that.</p> <p>19 Q. When did you become aware of that? You said in</p> <p>20 the last two years?</p> <p>21 A. I probably had some awareness of it, but really</p> <p>22 formally aware of it actually in 2018.</p> <p>23 Q. Okay. At what point in 2018?</p> <p>24 A. The full process, when I went to the</p> <p>25 Commissioners Court meeting. Before then, I just knew</p>

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<p style="text-align: right;">Page 85</p> <p>1 it came some way somehow from Waller County.</p> <p>2 Q. Had you ever, prior to the Commissioners Court</p> <p>3 process in the fall of 2018, tried to contact anybody at</p> <p>4 the County to ask how hours and locations for polling</p> <p>5 locations were decided?</p> <p>6 A. I would say no, it's not just a question that</p> <p>7 had came to me.</p> <p>8 Q. But as of 2018, the Prairie -- you were aware</p> <p>9 of the process for setting early voting hours and</p> <p>10 locations, correct?</p> <p>11 A. October of 2018.</p> <p>12 Q. Okay. This year, in the fall of 2019 -- or the</p> <p>13 summer of 2019, when students were coming back, did The</p> <p>14 Panther Party send out any social media messages</p> <p>15 welcoming them back to your knowledge?</p> <p>16 A. I don't know. I'd have to check.</p> <p>17 Q. Do you know whether The Panther Party sent out</p> <p>18 any social media messages encouraging students to get</p> <p>19 involved in the process for determining times and</p> <p>20 locations for the election coming up?</p> <p>21 A. No. We just really started getting back active</p> <p>22 for the school year.</p> <p>23 Q. You testified, though, that you now know or</p> <p>24 knew in at least October of 2018 that the County</p> <p>25 elections administrator, which was Christy Eason,</p>	<p style="text-align: right;">Page 87</p> <p>1 Q. Do you remember how you first learned what the</p> <p>2 early voting locations and hours initially approved for</p> <p>3 the November 2018 election were?</p> <p>4 A. I don't know how -- probably by word of mouth.</p> <p>5 I don't know who first told me, but I know it was a</p> <p>6 conversation that started up throughout multiple people.</p> <p>7 Q. Do you remember when in the fall of 2018 that</p> <p>8 information came?</p> <p>9 A. Probably late September, early October.</p> <p>10 Q. When you learned of those early voting hours</p> <p>11 and locations that had been approved by the County</p> <p>12 Commissioners Court, did The Panther Party notify the</p> <p>13 student body of that?</p> <p>14 A. Yes.</p> <p>15 Q. How so?</p> <p>16 A. Word of mouth, social media, different</p> <p>17 platforms.</p> <p>18 Q. Okay. I have looked through -- well, let me</p> <p>19 back up.</p> <p>20 You, on behalf of The Panther Party, or</p> <p>21 The Panther Party has provided some social media</p> <p>22 information in response to the discovery requests in</p> <p>23 this case; is that correct?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Were you the one who gathered that information?</p>
<p style="text-align: right;">Page 86</p> <p>1 confers with the party chairs over the voting schedule?</p> <p>2 A. Yes.</p> <p>3 Q. And then the party chairs agree on a schedule?</p> <p>4 A. That sounds about right.</p> <p>5 Q. And then that's presented to the Commissioners</p> <p>6 Court for approval.</p> <p>7 A. That sounds about right.</p> <p>8 Q. Do you make it a habit, either personally or in</p> <p>9 your position as the chairman of the board of The</p> <p>10 Panther Party, to follow the public notices of the</p> <p>11 Waller County Commissioners Court meetings?</p> <p>12 A. Keep track of it. I know it's probably like --</p> <p>13 I think it was like in the middle of the week at like</p> <p>14 nine o'clock, so I think I know the general time. But</p> <p>15 any information I come across, I do my best to try to</p> <p>16 disseminate it and keep people informed in some way,</p> <p>17 shape, or form.</p> <p>18 Q. Okay. You're aware that the Waller County</p> <p>19 Commissioners Court posts notice in advance of each of</p> <p>20 its meetings, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And you're aware that that notice and the</p> <p>23 agenda for the meeting is posted online on the County's</p> <p>24 website?</p> <p>25 A. Yeah. I think that they have to do that.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. I was.</p> <p>2 Q. What --</p> <p>3 A. Or me and my legal team. We gave them -- they</p> <p>4 knew my -- it's a public Twitter account, so --</p> <p>5 Q. Okay. Do you -- have you produced all of the</p> <p>6 social media posts from The Panther Party in relation to</p> <p>7 the 2018 election?</p> <p>8 A. No.</p> <p>9 Q. Okay. Because I was going to say, I've looked</p> <p>10 through the production set and I don't see any posts</p> <p>11 from The Panther Party sharing the early voting location</p> <p>12 hours and locations approved by the County Commissioners</p> <p>13 Court. But it's your recollection that there would be</p> <p>14 something like that?</p> <p>15 A. It may be on the Panther Party. It may be on</p> <p>16 mine. It may be in a GroupMe. There's a lot of</p> <p>17 different avenues for communication.</p> <p>18 Q. Is it fair to say you don't know for sure one</p> <p>19 way or the other right now?</p> <p>20 A. No. I know we shared it, though, in some way,</p> <p>21 somehow.</p> <p>22 And may you say -- you say you didn't see</p> <p>23 any communication based off early voting in 2018?</p> <p>24 Q. I did not see any social media posts from The</p> <p>25 Panther Party which included or shared the early voting</p>

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<p style="text-align: right;">Page 89</p> <p>1 schedule from the County Commissioners Court.</p> <p>2 A. So to my recollection, I know when we started</p> <p>3 doing the -- when we started transporting students to</p> <p>4 the polls, there was an initiative called Roll to the</p> <p>5 Polls; and there was, I believe, some information there.</p> <p>6 But it was something I would have to go look up, but I</p> <p>7 believe there is something on there.</p> <p>8 Q. Maybe that's something counsel and you can look</p> <p>9 at. And if there are some posts that I'm just missing</p> <p>10 or that weren't included, those can be supplemented. I</p> <p>11 know we both have some supplementing to do. So --</p> <p>12 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>13 8.</p> <p>14 (Exhibit No. 8 marked)</p> <p>15 Q. (BY MR. SEAQUIST) Mr. Muhammad, do you</p> <p>16 recognize what I've handed you as Exhibit 8?</p> <p>17 A. Yes.</p> <p>18 Q. And is this a retweet by The Panther Party?</p> <p>19 A. That's what it says on here.</p> <p>20 Q. And the date is October 9th, 2018?</p> <p>21 A. Correct.</p> <p>22 Q. What is the PV Panther?</p> <p>23 A. It's the campus newspaper.</p> <p>24 Q. So this is a retweet by The Panther Party</p> <p>25 sharing an article from the campus newspaper; is that</p>	<p style="text-align: right;">Page 91</p> <p>1 available" -- "will be in the Willie A. Tempton,"</p> <p>2 T-e-m-p-t-o-n, "Memorial Student Center October 29th</p> <p>3 through the 31st 8:00 to 5:00 p.m."</p> <p>4 A. Yes, that's what it says here.</p> <p>5 Q. Okay. So this is October 9th. At least at</p> <p>6 this time it was generally -- the information regarding</p> <p>7 the early voting hours at the student center was</p> <p>8 generally available; is that true?</p> <p>9 A. Yes.</p> <p>10 Q. And I think you testified that you might have</p> <p>11 even known about the early voting hours earlier in</p> <p>12 September, correct?</p> <p>13 A. Around that time, yes.</p> <p>14 Q. All right. But --</p> <p>15 A. Late September, early October.</p> <p>16 Q. Okay. In this tweet, I don't see anywhere</p> <p>17 where The Panther Party expressed any concerns about the</p> <p>18 early voting times. Do you?</p> <p>19 A. It's not necessarily -- you can't really</p> <p>20 express concerns on a retweet.</p> <p>21 Q. You can't add a message on a retweet?</p> <p>22 A. You can, but not on a retweet like this.</p> <p>23 Q. Okay. Well, in looking through the production</p> <p>24 materials, I don't see, I guess, really prior to the</p> <p>25 October 17th meeting, any social media from The Panther</p>
<p style="text-align: right;">Page 90</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. All right. Do you remember this article?</p> <p>4 A. I do remember it vague -- not the full article.</p> <p>5 I do remember it. I think I read it or about it.</p> <p>6 Q. Is it fair to say -- and I'm just</p> <p>7 summarizing -- but that the article generally focuses on</p> <p>8 the registration issues involving university addresses?</p> <p>9 A. I didn't write it, but I would have to read it</p> <p>10 again. This is October of 2018.</p> <p>11 Q. Okay. Would you have read it before you</p> <p>12 tweeted it?</p> <p>13 A. I probably would have looked over it, if I'm</p> <p>14 the one that retweeted it.</p> <p>15 Q. Who controls The Panther Party's social media</p> <p>16 accounts?</p> <p>17 A. There's multiple people. Like the E board</p> <p>18 would have access. I would have access. It just</p> <p>19 depends. I'm not responsible for every tweet or retweet</p> <p>20 of The Panther Party.</p> <p>21 Q. On the last page of this article --</p> <p>22 A. Is this the page that says "Here is a list of</p> <p>23 acceptable forms of ID"?</p> <p>24 Q. Yes.</p> <p>25 Below that, it says "Early Voting will be</p>	<p style="text-align: right;">Page 92</p> <p>1 Party expressing any concerns or reservations about the</p> <p>2 early voting times.</p> <p>3 Do you know whether The Panther Party did</p> <p>4 send out any tweets or social media posts expressing</p> <p>5 concerns about the early voting schedule that was</p> <p>6 adopted?</p> <p>7 A. Directly from The Panther Party's Twitter</p> <p>8 account? We may or may not. I can't recall every tweet</p> <p>9 or retweet. But I know there were concerns,</p> <p>10 word-of-mouth concerns, talking to people. I know we</p> <p>11 had some conversations via phone with Christy Eason. So</p> <p>12 there were different avenues by which we did express</p> <p>13 concerns that were just -- that weren't social media.</p> <p>14 Q. Were you involved in the discussions with</p> <p>15 Christy Eason?</p> <p>16 A. I was on some. I talked to her via phone, I</p> <p>17 think also in person maybe once.</p> <p>18 Q. And do you remember when The Panther Party</p> <p>19 first expressed concerns to Christy Eason about the</p> <p>20 early voting schedule?</p> <p>21 A. Yeah, somewhere around -- sometime around -- in</p> <p>22 October, before the Commission -- last Commissioners</p> <p>23 Court meeting.</p> <p>24 Q. Okay. Now, this article The Panther Party</p> <p>25 retweeted was specifically addressing an issue involving</p>

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<p style="text-align: right;">Page 93</p> <p>1 registration based on university addresses. 2 A. Yes. 3 Q. What is your understanding of what that issue 4 was? 5 A. So my understanding is that students were 6 initially given -- I believe by Waller County officials, 7 given an address either of 100 University Drive or 700 8 University Drive because it makes it easier because 9 there's a lot of student housing on campus, so they 10 usually choose the main one for the university, but that 11 was based off some map that was incorrect. It was 12 actually somewhere off campus. 13 So there was a potential -- potentially 14 their registration could have been null and void, so 15 this was pretty much trying to correct that and help 16 students actually be able to get the right address and 17 change it, if need be, or figure out something with the 18 elections office by which they can make sure they have 19 the right registration -- address on their registration. 20 Q. Okay. There -- mail is not delivered to 21 individual student residences on campus, correct? 22 A. Not delivered directly? 23 Q. Right. 24 A. There's a mail center on campus that students 25 get mail from.</p>	<p style="text-align: right;">Page 95</p> <p>1 registration cards, an address -- a geographical address 2 of either 100 or 700 University; is that right? 3 A. I believe so, yes. 4 Q. And is it your understanding that if you happen 5 to use 700 University, based on GIS or geocoding, that 6 location was actually off of campus? 7 A. I believe that was the issue that came up, yes. 8 Q. Okay. And perhaps more importantly than being 9 off of campus, it's actually in another voting precinct. 10 A. Yes. I think it was -- I think we're in 309. 11 I think it may have been 310. 12 Q. So the voting precinct 309, to your 13 understanding, is the Prairie View campus. 14 A. Yes, for the most part. 15 Q. And then 310 is south of campus in the City of 16 Prairie View. 17 A. Yes. 18 Q. Okay. Now, the problem was, for people who 19 used that 700 University Drive address, if they were to 20 come to vote in the 309 precinct on election day, they 21 weren't registered to vote there, correct? 22 A. Yes, that happens all the -- I believe maybe to 23 city hall. 24 MS. ADEN: I'm going to object. We didn't 25 discuss this at the beginning that we could do</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. So there's a central mail center where mail is 2 delivered for students. 3 A. Yes. 4 Q. And then it's up to students to go to that mail 5 center to pick up their own mail. 6 A. Or you may have your own P.O. box. But that's 7 pretty much the -- there's -- there's no home delivery, 8 I don't think, in Prairie View at all. 9 Q. Okay. So students were using either 100 10 University, which is the main road that goes into the 11 university here, correct? 12 A. Yes. It's now called -- Sandra Bland Parkway 13 is another name for it. 14 Q. But that changed -- do you know when that 15 change was made? 16 A. It had to be probably 2016, maybe 2017. 17 Q. Okay. Do people still refer to it as 18 University Drive, though? 19 A. It just depends. They do both. I think Google 20 says Sandra Bland Parkway. If you've been here for a 21 minute, you might just say University Drive. 22 Q. But if I say University Drive, you know what 23 road I'm talking about. 24 A. Yes. 25 Q. So students were using, on their voter</p>	<p style="text-align: right;">Page 96</p> <p>1 objections as to form and deal with everything later. 2 I'd like to stipulate that we'll -- plaintiffs are 3 agreeable to that. And I just wanted to note for the 4 record some objections to these leading questions. 5 You are providing a lot of information to 6 Mr. Muhammad in the form of a narrative followed by a 7 yes or no question. And I'm going to object to these 8 questions being leading. But -- 9 THE WITNESS: Can I go to the restroom? 10 MS. ADEN: Mr. Muhammad, you can -- 11 MR. SEAQUIST: Absolutely. We'll take a 12 break. Wait one second. 13 And I will agree with counsel that 14 objection, form, will suffice to the form of the 15 question. 16 MS. ADEN: Okay. And do you want him to 17 answer the question that you were beginning -- I don't 18 think you've -- we can look at the record, but do you 19 want him to finish anything before we break for a 20 restroom break? 21 MR. SEAQUIST: I thought he answered it. 22 THE WITNESS: I think it was just about 23 the precinct. 24 MR. SEAQUIST: So we'll take a break. 25 MS. ADEN: Okay.</p>



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<p style="text-align: right;">Page 97</p> <p>1 THE WITNESS: Cool.</p> <p>2 MR. SEAQUIST: I'll clean it up on the</p> <p>3 other end.</p> <p>4 (Recess from 11:13 a.m. to 11:23 a.m.)</p> <p>5 Q. (BY MR. SEAQUIST) Okay. We're back from our</p> <p>6 second break. Anything we need to go back and clean up?</p> <p>7 A. I want to reiterate that -- we talked about</p> <p>8 were there any information or notification disseminated</p> <p>9 about the early voting schedule, that there were</p> <p>10 different posts that were part of flyers when we were</p> <p>11 transporting students to the polls that showed the early</p> <p>12 voting schedules as a part of those flyers and posts.</p> <p>13 Q. Those posts would have come out around the time</p> <p>14 that voting had started, correct?</p> <p>15 A. Before voting had started. It was before early</p> <p>16 voting.</p> <p>17 Q. Okay. I guess my question is: Do you recall a</p> <p>18 social media post by The Panther Party, at the time it</p> <p>19 found out about the early voting hours, just posting the</p> <p>20 early voting schedule?</p> <p>21 A. Just a tweet like that in and of itself, like</p> <p>22 bare bones, just the early voting schedule? I would say</p> <p>23 no, because those posts really don't catch people's</p> <p>24 attention.</p> <p>25 Q. Okay. Before we -- was that the only thing you</p>	<p style="text-align: right;">Page 99</p> <p>1 What did you hear in terms of why this</p> <p>2 issue would actually void a voter registration?</p> <p>3 A. It's not voting fraud per se, but it's not --</p> <p>4 it's incorrect information. Like if you put you live</p> <p>5 somewhere that you don't actually live, whether you</p> <p>6 got -- whether that wasn't your knowledge at the time,</p> <p>7 you thought it was a correct address, you pretty much</p> <p>8 put something that -- you put a place that you didn't</p> <p>9 actually live.</p> <p>10 Q. That was a concern that people had?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Are you aware of anyone whose</p> <p>13 registration was actually canceled or declared null and</p> <p>14 void based on this issue?</p> <p>15 A. So we did things to address the issue; and</p> <p>16 based off that, we had some conversations with the</p> <p>17 election office and they took some steps to mitigate</p> <p>18 that issue.</p> <p>19 MR. SEAQUIST: Okay. I'm going to object,</p> <p>20 nonresponsive.</p> <p>21 Q. (BY MR. SEAQUIST) I appreciate that, but my</p> <p>22 question -- I want to talk to you about that, but my</p> <p>23 question first is: Are you aware, as a representative</p> <p>24 of The Panther Party, of anyone whose voter registration</p> <p>25 was either canceled or declared null and void because of</p>
<p style="text-align: right;">Page 98</p> <p>1 wanted to clear up?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Thank you for that.</p> <p>4 Before we took a break, we were talking</p> <p>5 about the voter registration issue.</p> <p>6 A. Uh-huh.</p> <p>7 Q. And I think that you had agreed with me that</p> <p>8 for students who used 700 University as their address,</p> <p>9 the result of that was that they ended up being</p> <p>10 registered in Precinct 310.</p> <p>11 A. That's what we were told.</p> <p>12 Q. So in early voting, do you have an</p> <p>13 understanding as to whether you have to vote in the</p> <p>14 precinct in which you are registered?</p> <p>15 A. In early voting, I believe you can vote</p> <p>16 anywhere in the county.</p> <p>17 Q. Okay. So as far as this address issue, it</p> <p>18 would really only relate to election day voting,</p> <p>19 correct?</p> <p>20 A. The address issue was on election day voting,</p> <p>21 but also there was speculation that it could null and</p> <p>22 void the whole registration as a whole for students.</p> <p>23 Those are some other issues that came up in discussion.</p> <p>24 Q. Okay. What was the reason for the</p> <p>25 speculation -- well, scratch that.</p>	<p style="text-align: right;">Page 100</p> <p>1 this issue?</p> <p>2 A. No, I hope not.</p> <p>3 Q. All right. Now, you were telling me that when</p> <p>4 the issue became known, you engaged in some discussions</p> <p>5 with folks at the County?</p> <p>6 A. Yes.</p> <p>7 Q. And tell me about that.</p> <p>8 A. So we had conversations with Christy Eason</p> <p>9 about it pretty much -- well, first we were trying --</p> <p>10 once we found out about it, before we started</p> <p>11 disseminating information, we started actually talking</p> <p>12 to people, getting background information, because it's</p> <p>13 always like he-say/she-say, so we wanted to make sure</p> <p>14 before we started sending information that we actually</p> <p>15 knew what was going on.</p> <p>16 So we talked to Christy Eason about it.</p> <p>17 We talked to some of our advisors about it just to get</p> <p>18 the background information before we actually made a</p> <p>19 move to announce it and help rectify it.</p> <p>20 Q. Okay. And did Christy Eason have a</p> <p>21 recommendation as to how to address the problem?</p> <p>22 A. I don't think it was -- I believe she had some</p> <p>23 recommendations. I think one of the recommendations</p> <p>24 that was finalized on it through our different</p> <p>25 conversations was that they would pretty much have an</p>



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<p style="text-align: right;">Page 101</p> <p>1 address form change at the -- after the students voted, 2 or whoever voted, if they had the wrong address. 3 Q. And was there some concern among some in the 4 Prairie View community about having to have a change of 5 address form? 6 A. Yes. 7 Q. And what was that? 8 A. I don't know a specific concern, but there's 9 always concerns around voting. 10 Q. But you don't remember any specific concerns in 11 regard to the change of address form. 12 A. Pretty much it's the ones I already iterated, 13 that, you know, it was null and void, their voter 14 registration. Then there's concerns about actually 15 once -- once that solution was brought, actually getting 16 it to where you alert students in time where they know 17 what's going on. 18 MR. SEAQUIST: I'm going to mark Exhibit 19 9. 20 (Exhibit No. 9 marked) 21 Q. (BY MR. SEAQUIST) Before we get to Exhibit 9, 22 can you tell me specifically where the concern came from 23 with regard to the voiding of registrations? Do you 24 remember who first raised that? 25 A. No, I don't remember who first raised it.</p>	<p style="text-align: right;">Page 103</p> <p>1 change of address form or statement of residence will be 2 required prior to voting." 3 Do you see that? 4 A. Yes. 5 Q. And so is it your understanding that 6 Ms. Eason's plan -- based on Ms. Eason's plan, 7 ultimately, any student who was registered to vote in 8 Waller County, whether it was in 309 or 310, could cast 9 a ballot on election day in 309? 10 A. Based off this from the Texas Secretary of 11 State, that's what it says. 12 Q. And was that your experience? 13 A. I early voted, so I guess it really didn't 14 matter. 15 Q. Okay. I understand. 16 You also understood -- or did The Panther 17 Party also understand that voters who were affected by 18 this issue would not be required to submit a change of 19 address form prior to voting in the 2018 general 20 election? 21 A. I do understand that. I would say that there 22 might have been some influence by us bringing up the 23 issue that got it clarified, so -- but I think I do 24 understand that. 25 Q. And so as we sit here today, are you, as the</p>
<p style="text-align: right;">Page 102</p> <p>1 Q. Do you remember specifically who expressed that 2 concern to you, if anyone? 3 A. No, I don't remember who first raised it to me. 4 Q. I'll represent to you, sir, that Exhibit 9 is a 5 retweet by Jayla Allen of a message from the Texas 6 Secretary of State. 7 A. It's not a retweet. It's a -- I think she 8 shared a screenshot. 9 Q. Okay. Had you seen this message before? 10 A. No. I don't remember this message. 11 Q. And by "this message," I mean have you seen the 12 official statement from the Texas Secretary of State 13 before? 14 A. I've -- I believe I have. 15 Q. Okay. And the statement says "It has been 16 communicated and confirmed that the Waller County plan 17 ensures, as it was always intended to do, that all 18 students residing on campus who are registered to vote 19 in the county will be able to cast their ballots at the 20 Precinct 309 polling location on campus, and that no 21 students will be impeded, hampered, or otherwise delayed 22 in exercising their constitutional right to cast a 23 ballot in the upcoming General Election." 24 A. That's what it says. 25 Q. All right. And then it goes on to say "No</p>	<p style="text-align: right;">Page 104</p> <p>1 representative of The Panther Party, aware of any 2 student who was told they could not vote in Precinct 309 3 on election day because of this addressing issue? 4 A. No, I'm not aware off the top, so I hope they 5 didn't -- I hope the issue was rectified. 6 Q. And -- okay. When did The Panther Party first 7 become concerned about the initial early voting schedule 8 approved by the County? 9 A. When did we first initially become concerned? 10 Q. Uh-huh. 11 A. So as an organization, probably in October 12 sometime. 13 Q. And what were the immediate concerns of The 14 Panther Party about the schedule that was adopted? 15 A. The immediate concerns were that we didn't have 16 any voting days the first week, only through the second 17 week. And then compared to other places in Waller 18 County -- compared to other places in Waller County, we 19 felt that it wasn't fair, our number of voting days, 20 when it came to our voting bloc, the size of it, the 21 demographic, and other elements. 22 MS. ADEN: Off the record for a moment. 23 (Discussion off the record) 24 MS. ADEN: Back on the record? 25 MR. SEAQUIST: Yes.</p>

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<p>1 Q. (BY MR. SEAQUIST) So you had expressed a -- one</p> <p>2 of the concerns The Panther Party had with regard to the</p> <p>3 initial early voting schedule which you just told us</p> <p>4 about was that Prairie View was not slated for early</p> <p>5 voting in the first week of the early voting period; is</p> <p>6 that right?</p> <p>7 A. Correct.</p> <p>8 Q. All right. Is it true that some other areas</p> <p>9 were not slated for early voting in the second week of</p> <p>10 early voting?</p> <p>11 A. Probably so. I would have to look at the</p> <p>12 voting schedule to refresh my memory.</p> <p>13 You mean other areas of Waller County or</p> <p>14 other areas in Prairie View?</p> <p>15 Q. Other areas of Waller County.</p> <p>16 A. I would -- yeah, probably so. I don't know. I</p> <p>17 would have to look at the voting schedule again.</p> <p>18 Q. You also said there was a concern in terms of</p> <p>19 the number and days of -- or of -- number of hours and</p> <p>20 days in early voting in Prairie View in comparison to</p> <p>21 some other areas of Waller County.</p> <p>22 A. Yes.</p> <p>23 Q. All right. Is it true that Prairie View</p> <p>24 received more days and hours in early voting than some</p> <p>25 hours -- excuse me, than some other areas of Waller</p>	<p>1 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>2 10.</p> <p>3 (Exhibit No. 10 marked)</p> <p>4 Q. (BY MR. SEAQUIST) Do you recognize Exhibit 10?</p> <p>5 A. Yes. I made the flyer.</p> <p>6 Q. You made this flyer?</p> <p>7 A. Yes.</p> <p>8 Q. And how did you make this flyer?</p> <p>9 A. Either Photoshop or Canva.</p> <p>10 Q. Did you use a university computer?</p> <p>11 A. I wouldn't be able to remember. I had my own</p> <p>12 personal computer, but I could have used a university</p> <p>13 computer.</p> <p>14 Q. Did you print paper copies of this flyer or</p> <p>15 just distribute it on social media?</p> <p>16 A. Probably both.</p> <p>17 Q. Do you know how many paper copies you would</p> <p>18 have made?</p> <p>19 A. I wouldn't be able to remember that.</p> <p>20 Q. Do you know for sure that you even made paper</p> <p>21 copies?</p> <p>22 A. I'm pretty sure I made paper copies.</p> <p>23 Q. Can you -- okay. But you don't know, if you</p> <p>24 did, how many that would have been?</p> <p>25 A. No.</p>
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<p>1 County?</p> <p>2 A. Probably so.</p> <p>3 Q. Okay. And then also received less than some</p> <p>4 others?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Why did The Panther Party believe that</p> <p>7 voting the first week was superior to early voting the</p> <p>8 second week?</p> <p>9 A. I don't think we ever said it was superior.</p> <p>10 Q. So there's no particular advantage to first</p> <p>11 week over second week as far as The Panther Party is</p> <p>12 concerned.</p> <p>13 A. We wanted first and second week.</p> <p>14 Q. So it was not that one was better than the</p> <p>15 other. It was that you wanted both.</p> <p>16 A. Yes.</p> <p>17 Q. Understood.</p> <p>18 Prairie View's homecoming began the first</p> <p>19 week of early voting, correct?</p> <p>20 A. Correct.</p> <p>21 Q. I think you had talked earlier about -- well,</p> <p>22 for students who did want to vote early the first week,</p> <p>23 there was a bus to take students to vote in Hempstead,</p> <p>24 correct?</p> <p>25 A. Yes. We helped put that together.</p>	<p>1 Q. Okay. And The Panther Party retweeted this</p> <p>2 post from Kirsten.</p> <p>3 A. Kirsten.</p> <p>4 Q. Kirsten. I'm sorry.</p> <p>5 A. She's going to get mad at you if you call her</p> <p>6 Kirsten.</p> <p>7 Q. Oh, I'm not going to do it again.</p> <p>8 Is Kirsten a member of The Panther Party?</p> <p>9 A. She graduated, so -- but she was when she was</p> <p>10 here.</p> <p>11 Q. At the time of the post?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. When it says "Get on the" -- well, it</p> <p>14 says "Get on the bus" and it says "9AM, 12PM, and 3PM";</p> <p>15 is that right?</p> <p>16 A. Yes.</p> <p>17 Q. And so this means that on Friday, October 26th,</p> <p>18 of 2018, there was bus service from campus, I guess in</p> <p>19 front of the Baby Dome. Where is the Baby Dome?</p> <p>20 A. The Baby Dome is right next to the MSC, the</p> <p>21 football stadium.</p> <p>22 Q. At the football stadium?</p> <p>23 A. It's by the football stadium.</p> <p>24 Q. So there was bus service leaving from the Baby</p> <p>25 Dome at 9:00 a.m., 12:00 p.m., and 3:00 p.m. to the</p>

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<p>1 courthouse in Hempstead?</p> <p>2 A. Yes.</p> <p>3 Q. When you say "Get on the bus," is it -- was it</p> <p>4 a literal bus?</p> <p>5 A. It was a literal bus.</p> <p>6 Q. Did it look like the picture here?</p> <p>7 A. It wasn't red.</p> <p>8 Q. Okay. But it was a big bus of that size.</p> <p>9 A. Correct.</p> <p>10 Q. Who chartered that bus?</p> <p>11 A. I believe the university.</p> <p>12 Are you talking about like the company or</p> <p>13 who got the --</p> <p>14 Q. Who hired the bus service?</p> <p>15 A. I believe one of -- one of the Prairie View</p> <p>16 departments helped us get it.</p> <p>17 Q. Did The Panther Party spend any financial</p> <p>18 resources paying for this bus?</p> <p>19 A. Probably when it came to -- we printed out</p> <p>20 flyers. But outside of financial resources, you had</p> <p>21 just, you know, energy. Like I had to -- I had to make</p> <p>22 the flyer. That took time.</p> <p>23 MR. SEAQUIST: I'm going to object,</p> <p>24 nonresponsive.</p> <p>25 Q. (BY MR. SEAQUIST) My question is just did The</p>	<p>1 was a team effort.</p> <p>2 Q. Did The Panther Party have to take any</p> <p>3 administrative action for the chartering of the bus?</p> <p>4 And by that, I mean, for example, did you have to fill</p> <p>5 out a form for the university to request the bus?</p> <p>6 A. No. We told the university what we were trying</p> <p>7 to do and they helped us get it. As an actual official</p> <p>8 form, I don't believe we had to fill out anything.</p> <p>9 Q. Okay. How did you tell the university?</p> <p>10 A. We told somebody in the student engagement</p> <p>11 office that we were working with. And then I'm not sure</p> <p>12 which department actually paid for the bus. It might</p> <p>13 have been the president's office. But they figured out</p> <p>14 a channel to get it done.</p> <p>15 Q. And when you say you told someone in the</p> <p>16 student engagement office, was that in a phone call?</p> <p>17 Was it a face-to-face conversation? Did you send an</p> <p>18 e-mail? How did you have that conversation?</p> <p>19 A. There was a lot of face-to-face conversations.</p> <p>20 Q. Was it the university or the students who chose</p> <p>21 the date that the bus would go?</p> <p>22 A. It was -- when you say the university, what do</p> <p>23 you mean? There's a lot of --</p> <p>24 Q. Maybe a better way to ask that question is:</p> <p>25 Who made the decision as to when this bus would run?</p>
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<p>1 Panther Party contribute any financial resources to the</p> <p>2 bus.</p> <p>3 A. So actual just direct physical money? So</p> <p>4 printing would be -- if we prepaid for printing and then</p> <p>5 we print it out to get these flyers printed, that would</p> <p>6 be financial resources. But I would have to look back</p> <p>7 and see if we actually spent money on anything else.</p> <p>8 But we didn't make -- buy the bus. We advertised for</p> <p>9 the bus. I think that's your question.</p> <p>10 Q. That is my question.</p> <p>11 A. Okay.</p> <p>12 MR. SEAQUIST: Objection, nonresponsive.</p> <p>13 Q. (BY MR. SEAQUIST) I'm going to ask one more</p> <p>14 time just so it's clear in the record. Okay?</p> <p>15 A. To get the bus, no, we didn't pay for the bus</p> <p>16 in any way, shape, or form.</p> <p>17 Q. Perfect. Thank you.</p> <p>18 Who made the request -- it's your</p> <p>19 recollection that Prairie View A&amp;M paid for the bus,</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. Who made the request to Prairie View A&amp;M for</p> <p>23 the bus to be chartered?</p> <p>24 A. Members of The Panther Party, just students in</p> <p>25 general, concerned faculty, staff, administrators. It</p>	<p>1 A. So I guess the final decision had to come</p> <p>2 through the university because they paid for it; but the</p> <p>3 students had a lot of input, especially since I made the</p> <p>4 flyer.</p> <p>5 Q. And did you specifically request bus service on</p> <p>6 this Friday?</p> <p>7 A. It was -- did I specifically myself?</p> <p>8 Q. Panther Party.</p> <p>9 A. It was a conversation with multiple people. I</p> <p>10 don't know if it was just me that brought it up</p> <p>11 initially.</p> <p>12 Q. Was there a consensus that Friday would be a</p> <p>13 good day to have this bus service?</p> <p>14 A. Yes. I think Friday may have been one of the</p> <p>15 only days during the -- I think Friday was one of the</p> <p>16 only days that we had off campus before the second week.</p> <p>17 I'm thinking about the schedule, if I'm looking at the</p> <p>18 schedule right.</p> <p>19 Q. Do you know how many students were transported</p> <p>20 by the bus to vote?</p> <p>21 A. No.</p> <p>22 Q. Did you ride on that bus?</p> <p>23 A. I think I had drove -- I didn't ride on the</p> <p>24 bus. I think -- no, I didn't ride on the bus myself. I</p> <p>25 helped students get on the bus, though.</p>

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<p>1 Q. Do you know how long the bus trip took</p> <p>2 roundtrip to go to Hempstead to take the students to</p> <p>3 vote and then bring them back?</p> <p>4 A. No. I'd have to speculate.</p> <p>5 Q. Have you talked to anybody who rode the bus to</p> <p>6 go vote at the county courthouse on Friday, October 26?</p> <p>7 A. I met some people when they were getting off</p> <p>8 the bus.</p> <p>9 Q. Did they tell you anything about the</p> <p>10 experience?</p> <p>11 A. I don't think they really had any problems</p> <p>12 other than they just -- probably just it was an</p> <p>13 inconvenience to go off campus.</p> <p>14 Q. It's The Panthers Party -- excuse me.</p> <p>15 It's The Panther Party's allegation in</p> <p>16 this case that it was forced to divert its modest</p> <p>17 organizational and financial resources to assisting</p> <p>18 Prairie View student voters by hosting trainings,</p> <p>19 organizing group transportation to early voting</p> <p>20 locations, and conducting other educational and</p> <p>21 organizing activities to assist PVAMU student voters.</p> <p>22 That's out of the complaint in this case.</p> <p>23 Do you agree with that statement as the contention of</p> <p>24 The Panther Party in this case?</p> <p>25 A. Yes, that we had to go above and beyond,</p>	<p>1 Q. So as a general matter, the use of The Panther</p> <p>2 Party's resources for trainings and organizing students</p> <p>3 to vote is the mission of The Panther Party, right?</p> <p>4 A. Yeah. To our ability, correct.</p> <p>5 Q. Okay. What trainings did The Panther Party</p> <p>6 host in advance of the 2018 election?</p> <p>7 A. We probably collaborated on some deputy</p> <p>8 trainings. That's pretty much it. Just helping give</p> <p>9 student -- giving students general information on how to</p> <p>10 vote.</p> <p>11 Q. And when you -- okay. Let's take those</p> <p>12 separately.</p> <p>13 Collaborated on deputy trainings, that's</p> <p>14 training to be a deputy voter registrar?</p> <p>15 A. Yes.</p> <p>16 Q. And so that's essentially training to assist in</p> <p>17 voter registration.</p> <p>18 A. Correct.</p> <p>19 Q. Okay. That's something that The Panther Party</p> <p>20 had done in prior elections, too, correct?</p> <p>21 A. Yes, we helped out with different trainings.</p> <p>22 Q. Okay. Is it fair to say that The Panther Party</p> <p>23 participates in voter registration activities regardless</p> <p>24 of what the particular voting schedule is?</p> <p>25 A. Is it fair to say that we participate in</p>
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<p>1 outside of what we normally do modestly, to help voters.</p> <p>2 Q. It is The Panther Party's core mission, at</p> <p>3 least in terms of political engagement, to educate and</p> <p>4 assist students with voting, right?</p> <p>5 A. That is our core mission, part of it.</p> <p>6 Q. Okay. I looked on the web -- The Panther Party</p> <p>7 has a website, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know what the domain name for that is?</p> <p>10 A. Pantherparty1876.org.</p> <p>11 Q. Okay. On the website, it says the political</p> <p>12 engagement committee seeks to promote the political</p> <p>13 interests of Prairie View and to increase political</p> <p>14 involvement through voter education, voter registration,</p> <p>15 advocacy, and more.</p> <p>16 A. Yes.</p> <p>17 Q. You're familiar with that statement on the</p> <p>18 website?</p> <p>19 A. Yeah, I probably wrote it.</p> <p>20 Q. All right. It's a good statement.</p> <p>21 A. Thank you.</p> <p>22 Q. And you agree with it.</p> <p>23 A. Yes.</p> <p>24 Q. Okay.</p> <p>25 A. Hopefully.</p>	<p>1 voter -- say it again.</p> <p>2 Q. Yeah.</p> <p>3 The Panther Party conducts voter</p> <p>4 registration activities regardless of what the election</p> <p>5 schedule is, right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You also said you give general</p> <p>8 information on how to vote.</p> <p>9 A. Uh-huh.</p> <p>10 Q. What type of information do you provide in</p> <p>11 that?</p> <p>12 A. Where to vote, times to vote.</p> <p>13 Q. And is that information provided through social</p> <p>14 media posts?</p> <p>15 A. Yes, and other avenues.</p> <p>16 Q. Other avenues being the word of mouth that</p> <p>17 you've talked to us about previously?</p> <p>18 A. Word of mouth, GroupMe.</p> <p>19 Q. Any other ways in which you disseminate that</p> <p>20 information?</p> <p>21 A. No, I think that covers most of the bases.</p> <p>22 Q. Okay. Is it also true that regardless of what</p> <p>23 the locations and hours are, The Panther Party is going</p> <p>24 to try to disseminate information about those hours and</p> <p>25 locations to students?</p>

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<p style="text-align: right;">Page 117</p> <p>1 A. Yeah, we'll try. 2 (Exhibit No. 11 marked) 3 Q. (BY MR. SEAQUIST) I marked Exhibit 10. I'm 4 sorry. 11. 5 Mr. Muhammad, do you recognize what I've 6 handed you as Deposition Exhibit 11? 7 A. Yes. 8 Q. Okay. Exhibit 11 is three different tweets 9 from The Panther Party. Let's go through them quickly. 10 The first, which is Plaintiffs 227 Bates 11 label, is a post that says "TPP" -- does that stand for 12 The Panther Party? 13 A. Yes. 14 Q. "Getting students registered to vote today at 15 the involvement fair". 16 A. Yes. 17 Q. And this was in August 29th of 2018? 18 A. That's what it says. 19 Q. Okay. And so what is an involvement affair -- 20 excuse me, the involvement fair? 21 A. It's like an open house for organizations. 22 Q. And so is this event specifically hosted by The 23 Panther Party? 24 A. No. It's hosted by the office of student 25 engagement.</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. Okay. And so was this registrar training that 2 was put on by the County or by The Panther Party? 3 A. I believe this was the County. 4 Q. Okay. The third page, Plaintiffs 245, what is 5 this page, sir? 6 A. It's a flyer advertising voter registration at 7 the University Courtyard, which is right across the 8 street from us, mainly targeting freshmen. 9 Q. Okay. And this event was October 4th, 2018? 10 A. Yes. 11 Q. And it says here free food will be provided. 12 A. Yes. 13 Q. Was this the event that was paid for by 14 Mr. Siegel's donation? 15 A. I believe so. 16 Q. Did The Panther Party spend any additional 17 money beyond Siegel's donation on this voter 18 registration event? 19 A. Yes. 20 Q. What was that? 21 A. I believe we paid for a deejay. That's about 22 all I can think of. 23 Q. And again, this event was to register new 24 voters. 25 A. Correct.</p>
<p style="text-align: right;">Page 118</p> <p>1 Q. All right. Is it financed by The Panther Party 2 in any way? 3 A. No. 4 Q. Okay. 5 A. Other than our table. 6 Q. Does The Panther Party own the table? 7 A. No. The material on the table. 8 Q. I see. Okay. 9 All right. So The Panther Party did 10 conduct voter registration in August 29th of 2018. 11 A. Yes. 12 Q. And that was before the County Commissioners 13 Court had actually adopted the early voting hours at 14 that point, correct? 15 A. I don't know the exact date when they adopted 16 early voting hours. 17 Q. Fair enough. 18 The next page, which is Plaintiffs 19 000179 -- 20 A. Yes. It's in small print at the bottom. I see 21 it. 22 Q. This is a tweet from The Panther Party 23 advertising the voter deputy registrar training, 24 correct? 25 A. Yes.</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. Okay. Is this similar to events that The 2 Panther Party had held in past elections? 3 A. Yes. It's not too out of the ordinary. 4 Q. The Panther Party's interrogatories say that it 5 created and paid for materials to address confusion and 6 conduct outreach about how to vote in the 2018 7 elections, including the early voting schedule. 8 A. Yes. 9 Q. Do you see that? 10 What materials did The Panther Party pay 11 to have created? 12 A. Flyers mainly, handouts. 13 MS. ADEN: Can you direct us to what rog 14 you're looking at, please? 15 MR. SEAQUIST: No. 11. 16 Q. (BY MR. SEAQUIST) In the next interrogatory, 17 No. 12, it actually says that you, Mr. Muhammad, paid 18 for those materials out of your pocket and that they 19 cost 50 to 100 dollars. Is that right? 20 A. Yes. 21 Q. So when you say in your interrogatories that 22 The Panther Party paid to have materials created, what 23 you really mean is that you personally paid for those 24 materials; is that true? 25 A. Yeah. It would be like a donation to The</p>



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<p>1 Panther Party for the use of The Panther Party.</p> <p>2 Q. But you didn't actually donate any money. You</p> <p>3 just paid out of your own pocket for some materials to</p> <p>4 be printed; is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. And you didn't receive any reimbursement for</p> <p>7 those materials from The Panther Party.</p> <p>8 A. I didn't ask for it.</p> <p>9 Q. Okay. Finally, in identifying the way that The</p> <p>10 Panther Party had to divert its organizational</p> <p>11 resources, you say that members volunteered their time</p> <p>12 and other resources, including cars and gas money, to</p> <p>13 drive students to off-polling campus -- excuse me, to</p> <p>14 off-campus polling locations during the first week of</p> <p>15 early voting.</p> <p>16 A. Yes.</p> <p>17 Q. How many students volunteered their cars to</p> <p>18 drive students to the polls the first week?</p> <p>19 A. I don't have an exact number.</p> <p>20 Q. How many trips did each of those students make?</p> <p>21 A. I don't have an exact number.</p> <p>22 Q. Do you know overall how many trips were made to</p> <p>23 the Waller County Courthouse?</p> <p>24 A. No.</p> <p>25 Q. Do you know how many students members of The</p>	<p>1 A. Depending on how you define our own resources.</p> <p>2 Q. Well, it didn't use any of its own financial</p> <p>3 resources.</p> <p>4 A. If you mean that we swiped our own personal</p> <p>5 debit card, then no.</p> <p>6 Q. Was there any scheduled training or activities</p> <p>7 that The Panther Party canceled or was unable to offer</p> <p>8 because they had volunteers driving students to the</p> <p>9 polls?</p> <p>10 A. I would say yes. Probably --</p> <p>11 Q. What --</p> <p>12 A. We probably had some events that we wanted to</p> <p>13 do; but instead of doing those events, there would</p> <p>14 probably have just been a regular getting them to the</p> <p>15 polls because, at MSC, we switched it up and had</p> <p>16 actually to drive them to the polls. So it changed the</p> <p>17 logistics of what we wanted to do.</p> <p>18 Q. Okay. So if I understand your testimony, what</p> <p>19 you're saying is that typically you would have focused</p> <p>20 on getting people to the MSC; but because of the early</p> <p>21 voting schedule, you focused on getting people to the</p> <p>22 courthouse in Hempstead.</p> <p>23 A. Yes.</p> <p>24 Q. Okay. If there was no voting at the MSC in the</p> <p>25 first week, there wouldn't have been any reason to try</p>
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<p>1 Panther Party drove to the polls?</p> <p>2 A. No.</p> <p>3 Q. When you say that volunteers drove students,</p> <p>4 where did they take them to?</p> <p>5 A. There were probably two locations. One was in</p> <p>6 Waller, the City of Waller -- City of Waller; and one</p> <p>7 was in Hempstead at the courthouse. But I think the</p> <p>8 primary location was the courthouse.</p> <p>9 Q. Did The Panther Party, the organization, expend</p> <p>10 any funds reimbursing those students for gas money?</p> <p>11 A. No.</p> <p>12 Q. Or the use of the -- did The Panther Party</p> <p>13 reimburse them in any way for the use of their cars?</p> <p>14 A. No. I don't know how you reimburse somebody</p> <p>15 for the use of their cars.</p> <p>16 Q. Well, for example, by paying like a mileage</p> <p>17 rate.</p> <p>18 A. No.</p> <p>19 Q. So the individuals who drove students to the</p> <p>20 polls, whether at the courthouse in Hempstead or in the</p> <p>21 City of Waller, volunteered their own time and</p> <p>22 resources; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. But The Panther Party itself didn't use any of</p> <p>25 its own resources, right?</p>	<p>1 to get people there then, correct?</p> <p>2 A. I would say that. There was no voting there</p> <p>3 the first week -- if there was no voting -- if there was</p> <p>4 voting, you mean, at Prairie View the first week?</p> <p>5 Q. No. My question for you, sir, is: Because</p> <p>6 there was no voting at Prairie View the first week of</p> <p>7 early voting, there would have been no reason to try to</p> <p>8 direct people to the MSC to vote that week.</p> <p>9 A. Because there was no voting, then there would</p> <p>10 be no reason to direct them to the MSC, correct.</p> <p>11 Q. How many members of The Panther Party own</p> <p>12 vehicles?</p> <p>13 A. I don't know.</p> <p>14 Q. Would you say it's a majority?</p> <p>15 A. I wouldn't say -- it depends. I wouldn't say</p> <p>16 it's the majority.</p> <p>17 Q. And let me make my question clear, which is I</p> <p>18 am referring specifically to the time that we're talking</p> <p>19 about, which is at the time of the 2018 general</p> <p>20 election.</p> <p>21 A. Yeah, I wouldn't know how many owned vehicles.</p> <p>22 Q. Okay. So while a few members of The Panther</p> <p>23 Party might have been using their own personal vehicles</p> <p>24 to take students to vote off campus, the majority of The</p> <p>25 Panther Party members would not have been doing that,</p>



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<p style="text-align: right;">Page 125</p> <p>1 correct?</p> <p>2 A. I would say I would assume so.</p> <p>3 Q. Those members who were not driving students off</p> <p>4 campus to vote were still available to engage in other</p> <p>5 activities on behalf of The Panther Party, correct?</p> <p>6 A. Either they were driving. They were helping to</p> <p>7 promote. There's different logistics. Like myself, I</p> <p>8 have a car, but I would spend a lot of time -- because</p> <p>9 also people came from Houston to help drive students</p> <p>10 that were -- to help get students to the polls.</p> <p>11 So even when I wasn't driving my car and</p> <p>12 transporting students, I was on the phone coordinating</p> <p>13 logistics and drivers and helping them meet students to</p> <p>14 get them there.</p> <p>15 Q. Who came from Houston?</p> <p>16 A. Different people.</p> <p>17 Q. Students of the university or --</p> <p>18 A. Different people. Both. And in -- both.</p> <p>19 Students, nonstudents.</p> <p>20 Q. Let me go back to -- my original question was:</p> <p>21 Did you have -- did The Panther Party cancel any</p> <p>22 scheduled events?</p> <p>23 A. Any scheduled events in stone? Like it was an</p> <p>24 event that we were -- that's a broad question.</p> <p>25 Q. My question -- well, for example, did you --</p>	<p style="text-align: right;">Page 127</p> <p>1 A. No.</p> <p>2 Q. You state in your interrogatory responses, in</p> <p>3 regard to the volunteers driving students to the</p> <p>4 courthouse, that those students would have otherwise</p> <p>5 been unable to cast a vote because of their other</p> <p>6 obligations, for example, class schedules, work</p> <p>7 obligations, and lack of access to transportation.</p> <p>8 Do you remember making that statement?</p> <p>9 A. Say it again.</p> <p>10 Q. Sure.</p> <p>11 There is a statement in the interrogatory</p> <p>12 responses --</p> <p>13 MS. ADEN: Can you tell us what number?</p> <p>14 MR. SEAQUIST: Yeah. Let me pull it up.</p> <p>15 MS. ADEN: It's No. 2.</p> <p>16 Q. (BY MR. SEAQUIST) This is also on -- it's</p> <p>17 Exhibit 2, Interrogatory No. 11. And I'm looking at the</p> <p>18 top of page 11.</p> <p>19 You say, in regard to the students who</p> <p>20 were driven off campus to vote, "These students would</p> <p>21 have been" -- "would have otherwise been unable to cast</p> <p>22 a vote because of their other obligations (for example,</p> <p>23 class schedules, work obligations) and lack of access to</p> <p>24 transportation."</p> <p>25 Do you see that?</p>
<p style="text-align: right;">Page 126</p> <p>1 the week before -- well, the first week of early voting,</p> <p>2 were there any scheduled Panther Party events that had</p> <p>3 to be canceled?</p> <p>4 A. There were prospective events; but even if</p> <p>5 there weren't any prospective events, we pretty much</p> <p>6 shut all those conversations down in order to focus on</p> <p>7 transporting students to the polls.</p> <p>8 Q. What prospective events were there?</p> <p>9 A. There was different events in regards to -- I</p> <p>10 mean, that was homecoming week, so different events in</p> <p>11 regards to homecoming, just whatever. There's a lot.</p> <p>12 Q. Can you tell me what you mean by events in</p> <p>13 regard to homecoming?</p> <p>14 A. Homecoming is an event in itself, so it was</p> <p>15 everything from things going throughout the day to</p> <p>16 actually things at night.</p> <p>17 Q. So part of the homecoming activities?</p> <p>18 A. Yes.</p> <p>19 Q. What homecoming activities does The Panther</p> <p>20 Party typically put on?</p> <p>21 A. There's nothing in particular. If somebody's</p> <p>22 got some ideas, we'll put something in place; but it's</p> <p>23 not necessarily a set event every homecoming.</p> <p>24 Q. Any other prospective events that you can think</p> <p>25 of?</p>	<p style="text-align: right;">Page 128</p> <p>1 A. Yes.</p> <p>2 Q. All right. Do you recall making that</p> <p>3 statement?</p> <p>4 A. Probably so, in between me and my legal team.</p> <p>5 Q. All right. But you understand that in the</p> <p>6 initial plan the Commissioners Court scheduled early</p> <p>7 voting from Monday, October 29th, through Wednesday,</p> <p>8 October 31st of 2018, from 8:00 a.m. to 5:00 p.m. each</p> <p>9 day --</p> <p>10 A. Uh-huh.</p> <p>11 Q. -- at the Memorial Student Center, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Now, students don't need access to</p> <p>14 transportation to vote at the student center, correct?</p> <p>15 A. They don't need access. They probably can</p> <p>16 walk.</p> <p>17 Q. Okay. So can you identify any individual</p> <p>18 students who would have been otherwise unable to vote</p> <p>19 during those times at the student center because of</p> <p>20 their other obligations?</p> <p>21 A. I know some students -- not a name, but I know</p> <p>22 some students had went out of town just in the hustle</p> <p>23 and bustle of being a student. I don't know if that</p> <p>24 week was midterms week. I think it may have been after</p> <p>25 or before homecoming that week. But there was a lot of</p>

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<p>1 things that were going on that those -- just those three</p> <p>2 days didn't give a lot of opportunity and actually</p> <p>3 hindered a lot of students from being able to vote.</p> <p>4 Q. Okay. But you can't tell me anyone in</p> <p>5 particular that was actually hindered in their ability</p> <p>6 to vote.</p> <p>7 A. Not an exact name, no.</p> <p>8 Q. You said people being out of town?</p> <p>9 A. Uh-huh.</p> <p>10 Q. That was not -- school was in session on that</p> <p>11 Monday through Wednesday, correct?</p> <p>12 A. Correct.</p> <p>13 Q. In the initial plan the Commissioners Court</p> <p>14 also provided voting from 7:00 a.m. to 7:00 p.m. in the</p> <p>15 Waller County Community Center on Thursday, November</p> <p>16 1st, and Friday, November 2nd, correct?</p> <p>17 A. Say it again. Thursday, November 1st, and</p> <p>18 Friday, November 2nd?</p> <p>19 Q. Yes.</p> <p>20 A. I believe that's right, if that's what they</p> <p>21 said.</p> <p>22 Q. Okay. And so that Thursday and Friday are the</p> <p>23 days immediately following the Monday through Wednesday</p> <p>24 voting at the Memorial Student Center, correct?</p> <p>25 A. That sounds like it coincides.</p>	<p>1 center, correct?</p> <p>2 A. Yes, but not everybody goes and checks the</p> <p>3 mail.</p> <p>4 Q. Who does at The Panther Party check the mail?</p> <p>5 A. Probably me or whoever has -- if I give the key</p> <p>6 to somebody.</p> <p>7 Q. And when you go to get the mail, how do you get</p> <p>8 to go get the mail?</p> <p>9 A. I may drive. Yeah.</p> <p>10 Q. Have you ever walked over to the post office?</p> <p>11 A. No.</p> <p>12 (Exhibit No. 12 marked)</p> <p>13 MR. SEAQUIST: I've marked Exhibit 12.</p> <p>14 Q. (BY MR. SEAQUIST) Mr. Muhammad, I will</p> <p>15 represent to you that Exhibit 12 is a Google satellite</p> <p>16 map.</p> <p>17 A. Uh-huh.</p> <p>18 Q. In the center of the map -- well, let me ask</p> <p>19 you. Do you recognize the picture displayed here to be</p> <p>20 a portion of the Prairie View A&amp;M campus?</p> <p>21 A. Yes.</p> <p>22 Q. You see the football stadium there?</p> <p>23 A. Yes.</p> <p>24 Q. All right. And do you see in the map where it</p> <p>25 is labeled the United States Postal Service?</p>
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<p>1 Q. Yeah.</p> <p>2 Did The Panther Party ever publicize the</p> <p>3 early voting hours at the Waller County Community</p> <p>4 Center?</p> <p>5 A. I believe we shared it. I don't know if it's</p> <p>6 somewhere on the Twitter, but I believe we shared it.</p> <p>7 Q. Okay. In looking through the social media --</p> <p>8 well, in looking through the documents produced, I</p> <p>9 didn't see any reference to the voting at the community</p> <p>10 center. But it's your recollection that there would be</p> <p>11 some notification from The Panther Party to let students</p> <p>12 know that they could vote at the community center.</p> <p>13 A. Yeah. Twitter isn't our only means of</p> <p>14 communication.</p> <p>15 Q. Okay. Because it would be important for them</p> <p>16 to know that that was an option to them, right?</p> <p>17 A. It would be important.</p> <p>18 Q. Okay. And you testified earlier that you've</p> <p>19 been to the Waller County Community Center.</p> <p>20 A. I have, yes.</p> <p>21 Q. You testified earlier that The Panther Party</p> <p>22 has a P.O. -- or at least did at the time -- had a</p> <p>23 P.O. box at the post office.</p> <p>24 A. Correct.</p> <p>25 Q. And that's right next-door to the community</p>	<p>1 A. Yes.</p> <p>2 Q. Is that the post office where The Panther</p> <p>3 Party's mailbox is?</p> <p>4 A. Yes.</p> <p>5 Q. All right. And there's a little red arrow</p> <p>6 there and in blue writing it says Waller County</p> <p>7 Community Center. Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. That's actually not the community center, is</p> <p>10 it?</p> <p>11 A. No.</p> <p>12 Q. All right. What -- can you identify in this</p> <p>13 picture the building that is the community center?</p> <p>14 A. It has a white roof, right next to the post</p> <p>15 office.</p> <p>16 Q. To the left in the picture?</p> <p>17 A. Yes, to the left.</p> <p>18 Q. Okay. Does this image fairly and accurately</p> <p>19 depict the portion of the campus shown on the map?</p> <p>20 A. Yeah, I think Google got it right.</p> <p>21 Q. All right. With the exception of the label of</p> <p>22 the community center?</p> <p>23 A. Yeah, outside of that.</p> <p>24 Q. Now, there is a sidewalk that leads from campus</p> <p>25 to the post office parking lot, correct?</p>

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<p style="text-align: right;">Page 133</p> <p>1 A. I'm not sure how far that sidewalk extends. 2 Q. Can you see a sidewalk in the image there? 3 A. I think I see something that looks like a 4 sidewalk, but I'm not sure if it's interrupted by grass 5 or not. 6 Q. Okay. And it goes, from campus, kind of across 7 the street from the Hobart Taylor Hall there. Do you 8 see that? 9 A. No. I'm not sure what you're referring to 10 exactly. 11 Q. Do you see the Hobart Taylor Hall? 12 A. I see Hobart Taylor Hall. 13 Q. And there's a street that runs immediately in 14 front of Hobart Taylor, correct? 15 A. In front of Hobart Taylor? Does it say 16 T.R. Solomon? Or behind Hobart Taylor? It's on -- 17 Q. I'm sorry. You're right. Behind Hobart 18 Taylor, there's a street that runs immediately behind 19 Hobart Taylor. 20 A. That's connecting two parking lots? 21 Q. Yes. 22 A. Yes. 23 Q. Okay. On the -- and then across that street 24 there's a large field. 25 A. Yes.</p>	<p style="text-align: right;">Page 135</p> <p>1 A. Far from the center of campus, so not in this 2 picture. The MSC is across a field, and then if you're 3 on campus -- say I'm in the engineering building which 4 is on -- on the side of campus we're on right now. A 5 walk to Hobart is pretty extensive. 6 Q. Okay. Did you petition the university to try 7 to have your engineering class moved closer to the 8 center of campus? 9 A. I mean, we can ask; but sometimes, if they 10 don't have any spots, then they won't do it. 11 Q. Well, my question was did you ask. 12 A. Yes, sometimes we did ask. We try to get 13 buildings -- we try to get rooms switched around. We'll 14 ask our teacher to see if they can move it. 15 Q. PVAMU operates a shuttle, correct? 16 A. Yes. 17 Q. And have you ever ridden that shuttle? 18 A. One time I twisted my ankle, so I couldn't 19 really drive. 20 Q. There are several different shuttle routes; is 21 that right? 22 A. Yes. 23 Q. One of them, though, is a campus loop. It just 24 goes around the campus? 25 A. I believe so.</p>
<p style="text-align: right;">Page 134</p> <p>1 Q. On the left side of the field, do you see a 2 sidewalk that runs down along the parking lot toward the 3 post office? 4 A. I'm not sure if that's a sidewalk. It could 5 just be a man-made sidewalk, just grass that was -- 6 Q. Do you know one way or the other whether 7 there's a sidewalk right there? 8 A. No, not off the top. 9 Q. Okay. Have you had classes -- or when you were 10 at Prairie View A&amp;M, did you have classes in Hobart 11 Hall? 12 A. Yeah. I didn't like going to them. 13 Q. Is it a common place for students to have 14 classes? 15 A. No, not really. It depends what your major is. 16 Q. Okay. Your major was engineering? 17 A. Yes. 18 Q. What classes did you have in Hobart Hall? 19 A. I had an engineering class there, which was out 20 of the normal because we have an engineering building. 21 But depending on the scheduling then, if there's no 22 other spots left, they might throw us in Hobart. 23 Q. Why didn't you like going to Hobart? 24 A. It's really far. 25 Q. Far from what?</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. When you're riding that shuttle, does it only 2 stop at scheduled stops or can you just ask the driver 3 to get out kind of wherever you want to along the route? 4 A. I think it's only scheduled stops. 5 Q. Do you know for sure one way or the other? 6 A. No. The campus shuttle, it's not as consistent 7 as we would like it to be, so I try to stay away from it 8 as much as I can, especially since I have a car. But I 9 don't know -- I know -- I think it's just scheduled 10 stops. 11 Q. Do you know whether the shuttle has a stop at 12 that parking lot behind the post office? 13 A. If the shuttle has a stop in the parking lot 14 behind the post office? 15 Q. Yes. 16 A. No. I think it may stop in front of Hobart 17 maybe or at the corner somewhere. 18 MR. SEAQUIST: I'm going to mark Exhibit 19 13. 20 (Exhibit No. 13 marked) 21 Q. (BY MR. SEAQUIST) Mr. Muhammad, I'll represent 22 to you that Exhibit 13 is a bus schedule that was 23 produced to us by plaintiffs. It is Bates labeled 24 Plaintiffs 00329. 25 A. Uh-huh.</p>

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<p>1 Q. And behind that are copies of the routes which 2 are labeled Plaintiffs 330 through 337. 3 And if you would, I would like to look at 4 the page that is labeled Plaintiffs 333. 5 A. Uh-huh. 6 Q. Do you see at the top left-hand of the page 7 there this is labeled the Panther Loop route? 8 A. Yes. 9 Q. And do you have an understanding as to what 10 that is? 11 A. I guess it's a loop around campus. 12 Q. Okay. And do you see that on that route the 13 stops are indicated in white circles? 14 A. Yes. 15 Q. And then the route is outlined in purple 16 highlighting? 17 A. Yes. 18 Q. Do you see a white circle in the parking lot to 19 the right of the bottom edge of the football stadium 20 there? 21 A. I do see a white circle there. 22 Q. Okay. Do you think that is a stop at the 23 parking lot behind the post office? 24 A. It looks close enough. 25 Q. Now, if we look back at the first page of this</p>	<p>1 Q. I assume that is south, although there's not an 2 indicator for north here, so I'm saying "below" just in 3 case. But it looks south on the map. Assuming north is 4 at the top of the map, then, yes, south. 5 A. It looks south. 6 Q. Okay. Now, if we look back on the first page, 7 near the top left-hand corner it says "Route, On Campus 8 Loop". Do you see that? 9 A. No. 10 Q. If I point right here -- 11 A. Oh, okay. 12 Q. "On Campus Loop"? 13 A. Uh-huh. 14 Q. And it says -- well, the purple -- on the 15 on-campus loop, it says it departs the MSC, correct? 16 A. Uh-huh. 17 Q. And then it goes around campus. Is that your 18 understanding? 19 A. Based off what this says on this paper. 20 Q. Okay. So this says it runs every 15 minutes. 21 A. Based off what it says on this paper. 22 Q. All right. You said you had ridden the shuttle 23 once? 24 A. Yes. 25 Q. Okay. And in your experience -- well, do you</p>
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<p>1 exhibit, which is page 329 -- 2 MS. ADEN: Can I stop you there? Because 3 doesn't it look like on that purple line north of the 4 circle that it says Solomon, which is the road behind 5 that Mr. Muhammad pointed out? Do you see that? 6 MR. SEAQUIST: It certainly does say 7 Solomon, but my recollection of the testimony -- and 8 Mr. Muhammad can certainly clarify -- is that the 9 T.R. Solomon is the road that runs in front of Hobart 10 Taylor Hall. 11 Q. (BY MR. SEAQUIST) Is that correct, sir? 12 A. Yes. 13 Q. Okay. And so if we look at 333, the bus route, 14 there is a portion of the route where the shuttle comes 15 down below T.R. Solomon, it looks like along the side of 16 the Hobart Hall there, and then drops off at that 17 parking lot. Does that appear to be correct to you? 18 A. I'm not sure what the actual dropoff is or 19 how -- I don't know if this is to scale or how long the 20 actual route is right there. So I wouldn't be able to 21 tell you where it drops off at. 22 Q. Okay. Is it fair from the depiction here that 23 the stop, however, is below T.R. Solomon? 24 A. When you say "below," you mean going south 25 of -- I guess that's south of T.R. Solomon?</p>	<p>1 remember how long you had to wait for the shuttle? 2 A. I mean, if I happened just to catch it at the 3 right time, then I wouldn't have to wait at all. 4 Q. Okay. But do you remember specifically? 5 A. No. That's something that's hard to remember. 6 Q. Okay. Are you aware that student groups hold 7 events at the Waller County Community Center? 8 A. Probably so. 9 Q. Do you know anyone who voted at the community 10 center? 11 A. No. 12 Q. Did The Panther Party organize any 13 transportation for students to go vote at the community 14 center? 15 A. I believe -- not -- I don't think we did. I 16 think we tried to take advantage of the days before the 17 community center. 18 Q. So you didn't feel like it was necessary to try 19 to arrange transportation for students to go vote at the 20 community center on that Thursday or Friday. 21 A. Not necessarily necessary, but we had done a 22 lot already before that. So we only had so much 23 resources to focus on. We already did like probably, I 24 think, four days up to that point. 25 Q. Were you present at the October 17th, 2018</p>

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<p style="text-align: right;">Page 141</p> <p>1 Commissioners Court meeting?</p> <p>2 A. Yes. I think I'm on video.</p> <p>3 Q. Okay. Other than that meeting, had you</p> <p>4 attended any other Commissioner Courts -- Commissioners</p> <p>5 Court meetings in the fall of 2018?</p> <p>6 A. No, not in the fall of 2018.</p> <p>7 Q. You testified a minute ago that you were on</p> <p>8 video at the Commissioners Court meeting?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Have you watched that video since?</p> <p>11 A. No. I don't like hearing my voice on tape.</p> <p>12 Q. So that's a no?</p> <p>13 A. That's a no.</p> <p>14 Q. But you did speak at the meeting.</p> <p>15 A. Yes.</p> <p>16 Q. And when you spoke, do you remember whether you</p> <p>17 identified yourself as a representative of The Panther</p> <p>18 Party?</p> <p>19 A. I probably mentioned it.</p> <p>20 Q. Do you know one way or the other?</p> <p>21 A. No.</p> <p>22 Q. Before -- well, let's say other than attending</p> <p>23 that meeting, during the fall of 2018 did you talk to or</p> <p>24 otherwise communicate with -- directly with any</p> <p>25 officials or employees of Waller County about voting</p>	<p style="text-align: right;">Page 143</p> <p>1 hours that we had and days, seeing if we could get more.</p> <p>2 And then pretty much the end to that conversation was</p> <p>3 that it would be -- the final decision was by the</p> <p>4 Commissioners Court, which is how we -- led us to going</p> <p>5 to the Commissioners Court meeting on the 17th, I</p> <p>6 believe, of October of 2018.</p> <p>7 Q. Do you remember whose phone you called from?</p> <p>8 A. No.</p> <p>9 Q. Do you remember where you were when you made</p> <p>10 that call?</p> <p>11 A. I probably was at work. I worked on campus in</p> <p>12 the juvenile justice.</p> <p>13 Q. Was that a call you would have made from a</p> <p>14 phone at the juvenile justice area or --</p> <p>15 A. It's a cell phone.</p> <p>16 Q. Cell phone?</p> <p>17 What was your cell phone number at the</p> <p>18 time?</p> <p>19 A. It's been the same for -- I think since high</p> <p>20 school. So 832 --</p> <p>21 MS. ADEN: I'm going to object because he</p> <p>22 is a party in this action as a representative and,</p> <p>23 before then, as an individual plaintiff and he could be</p> <p>24 contacted through counsel. I don't think it's relevant</p> <p>25 or necessary for you to have access to his personal cell</p>
<p style="text-align: right;">Page 142</p> <p>1 locations or hours?</p> <p>2 A. Yes, Christy Eason.</p> <p>3 Q. Okay. Can you tell me -- how many times did</p> <p>4 you talk to Christy Eason about voting locations and</p> <p>5 hours in the fall of '18?</p> <p>6 A. I don't know.</p> <p>7 Q. Could it have only been once?</p> <p>8 A. It was more than once. It was more than just</p> <p>9 me.</p> <p>10 Q. When you say it was more than just you, was it</p> <p>11 like a conference call?</p> <p>12 A. I remember one time it was me and Kirsten was</p> <p>13 on a call with her. I know other people had probably</p> <p>14 called and spoke to her as well. So it was more than</p> <p>15 just me as an individual reaching out.</p> <p>16 Q. Okay. And so that was a communication on the</p> <p>17 phone, correct?</p> <p>18 A. Yes. We may have -- all of us talked to her</p> <p>19 when she came -- I believe she came for a deputy</p> <p>20 registrar. We talked to her there as well, too. But I</p> <p>21 don't remember the full nature of the conversation.</p> <p>22 Q. In the phone call what -- what's -- what do you</p> <p>23 remember to be the substance of the call that you and</p> <p>24 Kirsten had with Ms. Eason?</p> <p>25 A. Expressing concerns about the -- the voting</p>	<p style="text-align: right;">Page 144</p> <p>1 number.</p> <p>2 MR. SEAQUIST: I understand. I will tell</p> <p>3 you the reason I am asking for his cell number is not to</p> <p>4 contact him directly, but to check it against the county</p> <p>5 phone records.</p> <p>6 MS. ADEN: Okay. Go ahead and answer.</p> <p>7 THE WITNESS: (832) 398-2088. I have do</p> <p>8 not disturb, so it's okay.</p> <p>9 MR. SEAQUIST: I assure you --</p> <p>10 MS. ADEN: He's not thinking of --</p> <p>11 MR. SEAQUIST: I assure you -- I won't</p> <p>12 take that personally.</p> <p>13 Q. (BY MR. SEAQUIST) Okay. Thank you for that,</p> <p>14 sir.</p> <p>15 Okay. Other than that one call with</p> <p>16 Ms. Eason, do you remember specifically any other calls</p> <p>17 that you were a party to with Ms. Eason?</p> <p>18 A. No, not off the top.</p> <p>19 Q. Okay. Did you ever talk to Trey Duhon, the</p> <p>20 county judge?</p> <p>21 A. I believe I had a conversation with him.</p> <p>22 Q. And where did that conversation take place?</p> <p>23 A. It could have been at the -- I know we spoke to</p> <p>24 him at the Commissioners meeting. We probably spoke to</p> <p>25 him before then. I know he was on campus once or twice</p>



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<p>1 and I seen him, so it was when I ran across him.</p> <p>2 Q. So with Mister -- or with Judge Duhon, that was</p> <p>3 not a phone conversation. That would have been an</p> <p>4 in-person conversation?</p> <p>5 A. I believe so.</p> <p>6 Q. And do you remember the nature or substance of</p> <p>7 that conversation?</p> <p>8 A. No.</p> <p>9 Q. Did you ever talk to -- do you know who Jeron</p> <p>10 Barnett is?</p> <p>11 A. Yes.</p> <p>12 Q. And he is the County Commissioner for Precinct</p> <p>13 3?</p> <p>14 A. Uh-huh.</p> <p>15 Q. And County Precinct 3 encompasses the</p> <p>16 university of Prairie View, right?</p> <p>17 A. Yes.</p> <p>18 Q. And have you ever talked to Commissioner</p> <p>19 Barnett about the early voting locations or hours in the</p> <p>20 fall of 2018?</p> <p>21 A. I remember at the Commissioners Court, when he</p> <p>22 voted down on adding more hours, I gave him a piece of</p> <p>23 my mind.</p> <p>24 Q. And when did you do that, sir?</p> <p>25 A. It was after the meeting.</p>	<p>1 Q. Anything else you told him at that time?</p> <p>2 A. I don't remember. But that was pretty much the</p> <p>3 gist of the conversation was my displeasure.</p> <p>4 Q. After that conversation have you had any</p> <p>5 further discussions with Commissioner Barnett about the</p> <p>6 early voting hours?</p> <p>7 A. I wouldn't say directly, but I know pretty much</p> <p>8 after that we -- since that was like the last</p> <p>9 Commissioners meeting, then we focused more so on what</p> <p>10 we could do to pretty much rectify what -- the decision</p> <p>11 they made and get students out to vote.</p> <p>12 MR. SEAQUIST: Objection, nonresponsive.</p> <p>13 Q. (BY MR. SEAQUIST) My question is just whether</p> <p>14 you had any other conversations directly with</p> <p>15 Commissioner Barnett.</p> <p>16 A. So a direct answer, I think, was in that</p> <p>17 question; but I would say I don't believe so.</p> <p>18 Q. Perfect. Thank you.</p> <p>19 Other than at that Commissioners Court</p> <p>20 meeting, have you talked to any other County</p> <p>21 Commissioners about the early voting schedule in Prairie</p> <p>22 View in 2018?</p> <p>23 A. I believe outside of my Commissioner Barnett,</p> <p>24 maybe Judge Duhon. I may have said something to some of</p> <p>25 the other people that were on the County Commissioners</p>
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<p>1 Q. And where was that conversation?</p> <p>2 A. Well, it was after the meeting and I addressed</p> <p>3 the Commissioners Court, so he was included in that as</p> <p>4 well, too. But it was at Commissioners Court.</p> <p>5 Q. So this was not during a time when you were</p> <p>6 signed up to speak. This was after that?</p> <p>7 A. So I addressed him. I addressed the whole</p> <p>8 Commissioners Court. So he was on the -- of course, on</p> <p>9 the panel. And then after, I spoke to him directly.</p> <p>10 Q. Okay. I guess that second piece is the part</p> <p>11 that I'm trying to nail down.</p> <p>12 When you spoke to him directly afterwards,</p> <p>13 where was he and where were you?</p> <p>14 A. We were still in the Commissioners Court. It</p> <p>15 was probably, I think, a break maybe.</p> <p>16 Q. Okay. So he was down off the dais and you were</p> <p>17 in the gallery or where?</p> <p>18 A. Yes. And we were pretty much talking to the</p> <p>19 Commissioners at that time that we could get ahold of.</p> <p>20 Q. Okay. And at that time you addressed</p> <p>21 Commissioner Barnett. And what -- you said you gave him</p> <p>22 a piece of your mind, but what did you tell him?</p> <p>23 A. I expressed my displeasure with his down vote</p> <p>24 and also his reasoning for his down vote for not</p> <p>25 approving more days.</p>	<p>1 Court, but I focused on them two because those are the</p> <p>2 main two that represent my precinct.</p> <p>3 Q. So no specific conversations with the other</p> <p>4 Commissioners that you can recall.</p> <p>5 A. No.</p> <p>6 Q. You testified earlier, I think, that you know</p> <p>7 the local chair of the Democratic party, Ms. Rosa</p> <p>8 Harris?</p> <p>9 A. Yes.</p> <p>10 Q. Did you talk to Rosa Harris about the early</p> <p>11 voting hours and locations in Prairie View during the</p> <p>12 fall of 2018?</p> <p>13 A. Yes. I also -- I expressed displeasure towards</p> <p>14 her, too, after that at the Commissioners Court meeting.</p> <p>15 Q. And you understood that as the local Democratic</p> <p>16 party chair, Ms. Harris had approved the early voting</p> <p>17 schedule adopted by the Commissioners Court, correct?</p> <p>18 A. She approved, yeah, for the -- for the</p> <p>19 precinct, but she doesn't necessarily represent me as a</p> <p>20 Democrat.</p> <p>21 Q. Do you -- are you a member of any third party?</p> <p>22 A. No. I would be independent. I'm independent.</p> <p>23 Q. Have you ever supported a third party</p> <p>24 candidate?</p> <p>25 A. Have I ever supported a third party candidate?</p>

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<p style="text-align: right;">Page 149</p> <p>1 Probably so. But I really don't focus on parties that 2 much, more so just what are my interests. And if those 3 interests align with -- if that party aligns with my 4 interests, then I may throw my vote in that election. 5 Q. So if I were to ask you if you could identify 6 any independent candidate, that is, one who is not 7 affiliated with either the Republican or the Democratic 8 parties, that you had supported in a past election, 9 could you tell me anybody? 10 MS. ADEN: Objection. And so you're 11 asking him in his individual capacity for this, for 12 these responses? 13 MR. SEAQUIST: Yes. 14 MS. ADEN: And where on the list of topics 15 does this fall under? 16 MR. SEAQUIST: Well, I think that it goes 17 to -- I mean, obviously we're talking about the chairman 18 of the board of the organization here and so I think 19 that his -- in particular, I'm following up on his 20 comment that Ms. Patlan didn't represent him as a 21 Democrat. 22 MS. ADEN: I'm going to object, for the 23 record, that I don't think this falls within the scope 24 of the deposition topics. 25 But you can, of course, answer to the best</p>	<p style="text-align: right;">Page 151</p> <p>1 A. I believe I did. 2 Q. Did you take any other students with you? 3 A. Some may have carpooled with me. 4 Q. You were also at the courthouse on October 5 24th, 2018, correct? 6 A. I don't know. Was I? I'm not sure. 7 Q. That was the day that the Commissioners Court 8 met and expanded the voting hours. 9 A. I might have been there. 10 Q. Do you remember talking to Christy Eason when 11 you were there that day? 12 A. No. It was -- I know I talked to her. I don't 13 know whether it was on the 17th or the 24th. 14 Q. You are aware, though, that the County 15 Commissioners Court did add additional early voting 16 hours and an extra location in the City of Prairie View, 17 right? 18 A. I am aware probably because we put pressure on 19 them. 20 MR. SEAQUIST: I'm going to object to 21 nonresponsive. 22 Q. (BY MR. SEAQUIST) I wasn't -- my question is 23 just whether you're aware of it. 24 A. I'm aware. 25 MR. SEAQUIST: Okay. I'm marking Exhibit</p>
<p style="text-align: right;">Page 150</p> <p>1 of your ability. 2 THE WITNESS: Ask the question again. 3 Q. (BY MR. SEAQUIST) My question is whether or not 4 you could identify for me any candidate who was not 5 associated with either the -- any independent candidate 6 who was not associated with either the Republican or 7 Democratic party that you have supported. 8 A. When you say support, what do you mean? 9 Q. Favored as a candidate. 10 A. So I'm more so objective. So I may agree 11 with -- I may not support a person fully, but I might 12 support some things they said. That doesn't mean I'm 13 going to vote for them, though, just because they 14 tickled my ears. 15 Q. Okay. 16 A. So I couldn't just say that no, I didn't. Like 17 Bernie is an independent; but he's, I think, running on 18 the Democratic ticket. Some things he says I'm cool 19 with. I know it's like -- I think it's called like 20 the -- it's like the green party or something like that. 21 I heard some things they said that I was cool with, but 22 that doesn't mean I'm just going to go out and vote for 23 them or that I'm rocking with them fully. 24 Q. Okay. Did you drive yourself to the courthouse 25 on October 17th?</p>	<p style="text-align: right;">Page 152</p> <p>1 14. 2 (Exhibit No. 14 marked) 3 Q. (BY MR. SEAQUIST) Mr. Muhammad, do you 4 recognize what I've handed you as Exhibit 14 today? 5 A. It looks like the -- the updated voting 6 location schedule probably after the 24th. It looks 7 like it's the one after the 24th. 8 Q. The 24th of October? 9 A. Yes. 10 Q. And that's in 2018? 11 A. Yes. 12 Q. And so this is something you've seen before? 13 A. It looks familiar. 14 Q. When the County put this out after the 24th of 15 October, do you know whether The Panther Party 16 disseminated it through social media or otherwise? 17 A. I know we shared it. I don't know if it was 18 through social media, though. 19 Q. Okay. The change extended the hours at the MSC 20 on Monday through Wednesday which were originally from 21 8:00 to 5:00. This changed it to 7:00 a.m. to 7:00 22 p.m., correct? 23 A. I believe that was the change. 24 Q. Okay. Also added Sunday voting on October 28th 25 at the Prairie View city hall?</p>

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<p>1 A. Yes, that's what it says here.</p> <p>2 Q. Have you ever voted in a city election in the</p> <p>3 City of Prairie View?</p> <p>4 A. I have.</p> <p>5 Q. And where do they hold those elections</p> <p>6 typically?</p> <p>7 A. It can be either at city hall or on campus.</p> <p>8 Q. Have you voted at the city hall before?</p> <p>9 A. I believe I have.</p> <p>10 Q. Have you ever been to the Panther Hill</p> <p>11 apartment complex?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know how far the Prairie View city hall</p> <p>14 is from the Panther Hill Apartments?</p> <p>15 A. I don't know exact location -- exact distance.</p> <p>16 Q. Where did you end up voting in the November 28</p> <p>17 election?</p> <p>18 A. Where did I end up voting in the November 28th</p> <p>19 election?</p> <p>20 Q. The general election, yes, sir.</p> <p>21 A. I believe I voted at the Waller County</p> <p>22 Courthouse.</p> <p>23 Q. Actually, let me ask you a question. Were you</p> <p>24 registered to vote in Waller County in 2018?</p> <p>25 A. Yes.</p>	<p>1 Q. Do you know what the typical lines were for</p> <p>2 early voting at the MSC?</p> <p>3 A. The typical lines for early voting?</p> <p>4 Q. Yeah.</p> <p>5 A. It depends. There was a really long line --</p> <p>6 are you talking about just during November 2018 or just</p> <p>7 in general?</p> <p>8 Q. No, sir. I'm talking about just the November</p> <p>9 2018 election.</p> <p>10 A. No, I couldn't tell you off the top.</p> <p>11 (Exhibit No. 15 marked)</p> <p>12 Q. (BY MR. SEAQUIST) I'll hand you what I've --</p> <p>13 I've marked Exhibit 15. I will hand it to you. Exhibit</p> <p>14 15 is two tweets that were retweeted by The Panther</p> <p>15 Party.</p> <p>16 A. Uh-huh.</p> <p>17 Q. Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. The first one says -- it's a picture of a</p> <p>20 person holding an "I voted" sticker.</p> <p>21 A. Uh-huh.</p> <p>22 Q. And it says "Only took 5 minutes go vote pv".</p> <p>23 And do you see the date and time of that</p> <p>24 post?</p> <p>25 A. October 31st.</p>
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<p>1 Q. And it's your recollection that you voted at</p> <p>2 the courthouse?</p> <p>3 A. Correct.</p> <p>4 Q. What day did you -- do you remember what day</p> <p>5 you voted?</p> <p>6 A. I voted in October for the November election.</p> <p>7 Q. During early voting?</p> <p>8 A. Yes. It was about October or early November</p> <p>9 because I think early -- early voting went into early</p> <p>10 November. The 2nd, I believe, was when it stopped.</p> <p>11 Q. Do you -- when you register to vote, do you</p> <p>12 register under the name Muhammad or Perkins?</p> <p>13 A. I register under the name Perkins.</p> <p>14 Q. Okay.</p> <p>15 A. But I hate using that name.</p> <p>16 Q. Is that -- is Perkins the name on your driver's</p> <p>17 license?</p> <p>18 A. Yes.</p> <p>19 Q. When you got to the courthouse to vote early,</p> <p>20 did you have any difficulties casting a ballot?</p> <p>21 A. There might have been a slight line, but that</p> <p>22 was pretty much it.</p> <p>23 Q. When you say "a slight line," do you know about</p> <p>24 how long it took you?</p> <p>25 A. No. Maybe a maximum of 30 minutes.</p>	<p>1 Q. Okay. On the second page, it's another Panther</p> <p>2 Party retweet that says "I VOTED. Now y'all go do the</p> <p>3 same!! It takes less than 5 minutes".</p> <p>4 Do you see the date on that one?</p> <p>5 A. Yes.</p> <p>6 Q. October 29th, 2018, correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Do you have any reason to dispute that</p> <p>9 the average voting time at the MSC during early voting</p> <p>10 was five minutes or less?</p> <p>11 A. I don't have any -- that's speculation. I</p> <p>12 mean, I didn't sit there with a --</p> <p>13 Q. My question is: Do you have any reason to</p> <p>14 dispute it?</p> <p>15 A. I have no reason to --</p> <p>16 MS. ADEN: I'm sorry. I'm going to</p> <p>17 object. Can you -- to the question, because you said</p> <p>18 the average voting time. Aren't these documents that</p> <p>19 you're showing just talking about like two moments in</p> <p>20 time that people are talking about? So where is the</p> <p>21 average coming from?</p> <p>22 MR. SEAQUIST: Well, I'm not -- I'm asking</p> <p>23 Mr. Muhammad about his knowledge.</p> <p>24 MS. ADEN: About the average voting time.</p> <p>25 MR. SEAQUIST: These are two examples.</p>

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<p style="text-align: right;">Page 157</p> <p>1 MS. ADEN: And you're asking him for his 2 opinion about the average voting time. 3 MR. SEAQUIST: That, I am. 4 MS. ADEN: Okay. 5 THE WITNESS: I have no reason to confirm 6 or deny that statement. 7 Q. (BY MR. SEAQUIST) Okay. Did you have anybody 8 tell you in relation to early voting at the 2018 general 9 election that there were any kind of long lines for 10 voting? 11 A. Not that I can think of. 12 Q. Okay. In terms of the 20 members of The 13 Panther Party, you know, around the 2018 general 14 election -- and I understand that's approximate, but 15 it's the number that's been given in the 16 interrogatories. Is it fair to say that -- is it fair 17 to say that the members may have different socioeconomic 18 circumstances? 19 A. Yes. 20 Q. For example, some of the members may have a 21 vehicle while others do not, correct? 22 A. Yes. 23 Q. And some members of The Panther Party may have 24 different access to financial resources than others, 25 right?</p>	<p style="text-align: right;">Page 159</p> <p>1 was a Parade of Voters or a march of some sort? 2 A. I believe that was on election day. 3 Q. And that was a march on campus? 4 A. Yes. 5 Q. Did The Panther Party participate in organizing 6 that march? 7 A. Yes. 8 Q. How did that march come about? 9 A. Somebody said they wanted to do a march. I 10 don't know who first said it. And then we said "That's 11 a cool idea. Let's do it." And we put it together and 12 we did it. 13 Q. And what specifically was The Panther Party's 14 role in organizing the march? 15 A. Just pretty much helping with the logistics as 16 much as we could and helping promote it. 17 Q. Did The Panther Party play a role in choosing 18 the route of the march? 19 A. I don't know if we had much input on that. 20 Q. To your recollection, did the members of The 21 Panther Party participate or walk in the march? 22 A. Yes. A few of our members actually spoke at 23 the ending rally. 24 Q. Okay. And where did the ending -- where did it 25 end up?</p>
<p style="text-align: right;">Page 158</p> <p>1 A. Yes. 2 Q. Some may be better off than others are. 3 A. Correct. 4 Q. Some members of The Panther Party may live on 5 campus. Others may not. 6 A. Yes. 7 Q. Some may even live outside of Prairie View; is 8 that true? 9 A. Yes. 10 Q. Some members of The Panther Party may have been 11 registered to vote in Waller County for the 2018 12 election and some may not have been, correct? 13 A. Some. I don't know exactly what "some" means, 14 but if it's more than one, yeah. 15 Q. To your knowledge, do you know whether all of 16 the members of The Panther Party who were registered and 17 able to vote choose to vote early in the 2018 general 18 election? 19 A. To my knowledge, I don't know if everybody 20 voted early, no. 21 Q. So some members may choose to vote early 22 because it's more convenient and others may choose to 23 vote on election day; is that correct? 24 A. That's an individual prerogative, so -- 25 Q. Okay. On election day am I correct that there</p>	<p style="text-align: right;">Page 160</p> <p>1 A. In front of the MSC. 2 Q. In front of the MSC? 3 And the march started at 10 o'clock on 4 election day, November the 6th, in 2018? 5 A. I don't know. 6 Q. Was it a walkout march? 7 A. What does a walkout march mean? 8 Q. Where students leave class to go participate in 9 the march? 10 A. That was an individual prerogative. 11 Q. Was there supposed to be an air horn blown at 12 the time it was starting so that students could come out 13 and join the march? 14 A. I don't know. They knew where to meet us at. 15 Q. Okay. Can we look back -- or will you look 16 back with me at Exhibit 6? 17 A. Uh-huh. 18 Q. This is the flyer for the Parade of Voters on 19 November 6th, correct? 20 A. Correct. 21 Q. And this was retweeted by The Panther Party? 22 A. Yes. 23 Q. At the bottom of this -- and I will apologize. 24 It's not the clearest of writing. But does this flyer 25 identify the parade route?</p>

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<p>1 A. Yes.</p> <p>2 Q. Can you make out the --</p> <p>3 A. It identifies the departure.</p> <p>4 Q. Okay. Can you -- below that, do you see where</p> <p>5 it says "Parade Route"?</p> <p>6 A. Oh, yes, I see that.</p> <p>7 Q. Can you identify what the route of the parade</p> <p>8 was?</p> <p>9 A. It looks like it says UC courtyard, the View,</p> <p>10 Phase I, Phase -- I don't know -- Phase something and</p> <p>11 the athletic complex and MSC.</p> <p>12 MR. SEAQUIST: Okay. Now I'm going to</p> <p>13 mark 16.</p> <p>14 (Exhibit No. 16 marked)</p> <p>15 Q. (BY MR. SEAQUIST) Okay. 16 is a tweet that was</p> <p>16 retweeted by Jayla Allen. And you know who Jayla Allen</p> <p>17 is, correct?</p> <p>18 A. Yes.</p> <p>19 Q. A member of The Panther Party?</p> <p>20 A. Amongst other things.</p> <p>21 Q. A plaintiff in the lawsuit?</p> <p>22 A. Yes, amongst other things.</p> <p>23 Q. Okay. So on the half part of this, this shows</p> <p>24 the Parade of Voters and then on the right side it shows</p> <p>25 the parade route. Do you see that?</p>	<p>1 map?</p> <p>2 A. Not -- I'll have to look at it for a minute.</p> <p>3 It may be --</p> <p>4 Q. I'll give you a hint that it's Building 7.</p> <p>5 A. Yeah, Building 7. I can see it.</p> <p>6 Q. All right. So if we look at our parade route,</p> <p>7 it says the route is the UC courtyard to the View. Do</p> <p>8 you know where the View is?</p> <p>9 A. It's 17, I believe.</p> <p>10 Q. So I think 15 is University View.</p> <p>11 A. The View is -- I believe it's on -- oh, yeah,</p> <p>12 it's 15.</p> <p>13 Q. Okay. Will you draw me the route that the</p> <p>14 students took from the UC courtyard to the View?</p> <p>15 A. I don't believe they actually walked to the</p> <p>16 View.</p> <p>17 Q. Where do you recall the route going?</p> <p>18 A. I think we just came -- met at the corner right</p> <p>19 here in front of Parking Lot 40 and 41. Or at least I</p> <p>20 didn't walk to the View because I didn't see a need to</p> <p>21 go back and come double trip myself.</p> <p>22 Q. Okay. So did you start at the courtyard?</p> <p>23 A. I started at the courtyard and then met at the</p> <p>24 corner of Anne Preston and Norris Street.</p> <p>25 Q. Okay. Will you start from the courtyard and</p>
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<p>1 A. Yes.</p> <p>2 Q. Did you march in this parade?</p> <p>3 A. I participated. I walked a bit, rode on a --</p> <p>4 there was a little trailer.</p> <p>5 Q. I'm sorry. I didn't hear the last part.</p> <p>6 A. There was a trailer also, so I -- I</p> <p>7 participated in the -- in the parade, yes.</p> <p>8 Q. Okay. And so this says it's going to depart</p> <p>9 from the UC courtyard. What is the UC?</p> <p>10 A. The UC is University College. It's where</p> <p>11 freshmen stay for the most part.</p> <p>12 Q. And is that the building that's directly across</p> <p>13 the street from where we're sitting right now?</p> <p>14 A. Yes.</p> <p>15 Q. And where is the courtyard at the UC?</p> <p>16 A. In the middle of the UC.</p> <p>17 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>18 17.</p> <p>19 (Exhibit No. 17 marked)</p> <p>20 Q. (BY MR. SEAQUIST) Do you recognize what I've</p> <p>21 handed you as Exhibit 17?</p> <p>22 A. It looks like a map of my alma mater.</p> <p>23 Q. All right. You know it well, correct?</p> <p>24 A. Yes.</p> <p>25 Q. All right. Can you identify the UC on this</p>	<p>1 map the route to Anne Preston and Norris Street?</p> <p>2 A. I guess that would be here, right there.</p> <p>3 Q. Okay. And then the next building -- it's hard</p> <p>4 to read on here, but I will represent to you -- and if</p> <p>5 you look at Exhibit 6, it looks to me like it actually</p> <p>6 says Phase III. Do you know what the Phase III building</p> <p>7 is?</p> <p>8 A. Phase III, I believe, is Building 28.</p> <p>9 Q. Okay. Can you draw the route from where you</p> <p>10 left off to Phase III?</p> <p>11 A. Yeah. We didn't actually go into Phase III.</p> <p>12 We kind of just went around Phase III. But it's around</p> <p>13 there.</p> <p>14 Q. Okay. Next on the Exhibit 6 route, I believe,</p> <p>15 was Phase I and II.</p> <p>16 A. Uh-huh.</p> <p>17 Q. Do you know where those buildings are?</p> <p>18 A. It might be -- I think this is Phase I and II</p> <p>19 over here -- 52.</p> <p>20 Q. Okay. Can you trace the route from Phase III</p> <p>21 to Phase I and II?</p> <p>22 A. I think we went this way. I may have took a</p> <p>23 shortcut, though.</p> <p>24 Q. And when you say you could have taken a</p> <p>25 shortcut, there are some areas on campus where you can</p>



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<p>1 cut through either, you know, a grassy area, a pavilion, 2 something like that, without following sidewalks or 3 roads, correct? 4 A. Yeah. But don't walk on the grass, though. 5 You get in trouble. 6 Q. Okay. All right. From Phase I and II, the 7 next stop on the route was the athletic complex. Do you 8 know where the athletic complex is on that map? 9 A. I think it was -- which way did we take? We 10 may have took this way. 11 Q. Okay. And then you ended up at the student 12 center. So can you close the route to the student 13 center? 14 A. (Witness complied). 15 Q. Okay. Looking at the black line that you've 16 just drawn, does that fairly and accurately depict the 17 route of the march on November 6, 2018? 18 A. It might have been one -- I'm not sure which 19 route we took from Phase I and II to the student center. 20 There are two ways to do it. I'm not sure off the top 21 which way we took. There's two streets to get there, so 22 a long way and a shorter way. 23 Q. Okay. Show me the short -- show me the other 24 way. Use a squiggly line or just dots. That's perfect. 25 A. I think --</p>	<p>1 Q. So Siegel was there marching? 2 A. Yeah, he came. 3 Q. Below him, is that Nev Schulman? 4 A. I think -- people were excited to see him. I 5 really don't know who he is, to be honest with you. 6 Q. Do you know -- is he the -- on a show called -- 7 MTV show called Catfish? Have you heard of that show? 8 A. I think that's what they said. I don't watch 9 it. So I believe that's what I heard. 10 Q. The top right-hand, who is that? 11 A. Xante. 12 Q. And he is a member of the City View -- or 13 excuse me, the Prairie View City Council? 14 A. He's a councilman, student, different -- 15 different things, different titles. 16 Q. Okay. And the next page, again, Mr. Schulman 17 in front of marchers? 18 A. NAACP. 19 Q. Okay. What NAACP -- is this just a local 20 chapter of the NAACP? 21 A. Yes. The Prairie View -- the student 22 organization. 23 Q. Okay. Okay. On the last page there's a tweet 24 from Jayla Allen and this is just an ABC News story. 25 The caption is "Prairie View A&amp;M students walked out of</p>
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<p>1 Q. And so you're not entirely sure which of those 2 two routes you took, but it was one or the other. 3 A. Correct. 4 Q. Okay. Overall do you know how -- the distance 5 of the march? 6 A. No. 7 Q. The march was well attended, correct? 8 A. Yeah. It was hot out there, too. 9 Q. If you look -- only in Texas is it hot in 10 November. 11 If we look back -- 12 MS. ADEN: And I like the sun, so for the 13 next depo I'm willing to switch positions. 14 Q. (BY MR. SEAQUIST) If we look back at -- I 15 believe this was Exhibit 16. Behind the flyer are just 16 some pictures that were produced by the plaintiffs. If 17 you look at Plaintiffs 110, do you recognize that as 18 showing the start of the march there? 19 A. No. That's the end of the march. 20 Q. The end of the march. Okay. 21 Page 112, the next page, shows people 22 marching, correct? 23 A. Yes. 24 Q. The top left, is that Mike Siegel? Who's -- 25 A. Mike Siegel, yeah, that's him.</p>	<p>1 class and marched". 2 Do you know whether that's accurate? 3 A. No, I don't. I don't know how many students 4 actually walked out of class. That's pretty much 5 something that ABC decided to report. I don't know who 6 they talked to. 7 Q. Is it fair to say that not all news reports are 8 accurate? 9 A. Yes, it's fair to say that. 10 Q. As a plaintiff in this lawsuit, is it your 11 contention -- or is it The Panther Party's contention, 12 excuse me, that the Waller County Commissioners -- the 13 Waller County Commissioners Court adopted the early 14 voting schedule for the 2018 general election to 15 intentionally discriminate against African-American 16 voters? 17 A. I would say that it's my contention that they 18 didn't do enough to make sure that it was -- it was the 19 best environment for voting, especially after we 20 expressed discontent with the current voting schedule. 21 Q. Okay. But it's not your contention that the 22 Commissioners Court was intentionally discriminating 23 against African-American voters in the county? 24 MS. ADEN: I'm going to object to the 25 question because intentional discrimination is a</p>

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<p style="text-align: right;">Page 169</p> <p>1 question of law and he is not a lawyer. So to the 2 extent you're asking him for a legal conclusion about 3 the nature of the claims, he can't answer that question. 4 MR. SEAQUIST: Okay. I think we have an 5 agreement that objection, form, is sufficient. So 6 that's okay. You're objecting to the form of the 7 question. 8 Q. (BY MR. SEAQUIST) But my question is -- and I 9 think you still answer it unless you instruct him not 10 to -- which is: Is it your contention in this lawsuit 11 that the Waller County Commissioners Court was 12 intentionally discriminating against African-Americans? 13 A. Is it my contention that they were 14 intentionally -- what do you mean by intentional 15 discrimination? Like they say, "Oh, they're black. We 16 don't want them to vote"? Is that what you're asking 17 me? 18 Q. Do you believe that the Waller County 19 Commissioners Court adopted the early voting schedule 20 for the intentional purpose of abridging 21 African-Americans' votes in Waller County? 22 A. That would be me speculating their mind-set. 23 But people in The Panther Party do believe that and have 24 those feelings. 25 Q. Are there any statements by any Waller County</p>	<p style="text-align: right;">Page 171</p> <p>1 A. Yes. 2 Q. Okay. Anything outside of that public meeting, 3 any statements that you're aware of that people have 4 told you, anything like that? 5 A. I don't hang around with them like that, so I 6 don't know what they say in their personal 7 conversations. 8 Q. I need to ask you the same question as it 9 relates to intentional discrimination on the basis of 10 age; but if your answer is the same, you can just say 11 that. 12 But my question is: You know, as a 13 plaintiff in this lawsuit, is it your contention that 14 the Waller County Commissioners Court adopted the early 15 voting schedule to intentionally discriminate against 16 young voters? 17 A. So speaking of just the Commissioners Court, I 18 wouldn't say I've heard that directly, especially at the 19 Commissioners meeting. I would add that I have heard 20 different entities express how they don't believe that 21 the students should be defined as residents. So that's 22 been some things I've heard in the past. 23 Q. Okay. What entities have said that? 24 A. Community members, whether in Waller -- Waller 25 County is pretty broad, so -- but I've heard those</p>
<p style="text-align: right;">Page 170</p> <p>1 official that you can point me to that would suggest 2 that the Commissioners Court was intentionally trying to 3 discriminate against African-American voters in Prairie 4 View? 5 A. If you're asking if there's a statement out 6 there that says "I don't like black people," I haven't 7 come across that. 8 Q. Well, it wouldn't have to be that. I'm just 9 asking if there's any -- this is my chance to understand 10 and learn about your contentions. 11 So are there any statements by any of the 12 Commissioners Court that you felt were suggestive of 13 intentional discrimination against African-Americans? 14 A. When I went to the Commissioners Court on 15 October 17th, some of the Commissioners gave us a very 16 hard time. In my personal opinion and in some other 17 people's opinion, the way they communicated and 18 expressed our petition, they gave us a very hard time. 19 So we believe that it could have been -- there could 20 have been a lot of things why they did that, but it's 21 something that really displeased us. 22 Q. Okay. And when you say they gave you a hard 23 time, you're talking about comments that they would have 24 made as part of the public meeting that would be 25 reflected on the recording that was made.</p>	<p style="text-align: right;">Page 172</p> <p>1 conversations. 2 Q. Okay. Have you ever been a party to a lawsuit 3 besides this one? 4 A. No. 5 MR. SEAQUIST: Can we take a short break? 6 MS. ADEN: Sure. 7 (Recess from 1:02 p.m. to 1:11 p.m.) 8 MR. SEAQUIST: Okay. Back on the record. 9 Q. (BY MR. SEAQUIST) Mr. Muhammad, I'd like to 10 thank you for your time. Have you understood all my 11 questions today? 12 A. Yes, for the most part. I can't think of 13 anything that I didn't understand. 14 Q. Okay. Have you given the best answers you can? 15 A. Yes. 16 Q. All right. Have I been courteous to you today? 17 A. Yes, you have. 18 MR. SEAQUIST: Okay. Well, thank you very 19 much for your time. 20 And I'll pass the witness. 21 MS. ADEN: We do have some brief redirect 22 and -- hopefully brief. 23 EXAMINATION 24 BY MS. ADEN: 25 Q. Mr. Muhammad, you testified that some Prairie</p>

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<p>1 View AMU students, including Panther Party members, vote 2 early and others vote on election day. Is that 3 accurate? 4 A. Yes. 5 Q. Do you have an opinion about whether PVAM 6 students, including Panther Party members, tend to use 7 early voting more than election day voting? 8 A. I mean, since there's more opportunity in early 9 voting, then they'll use early voting. But it just 10 depends. But early voting issues -- 11 Q. You spoke about your personal access to a car. 12 A. Uh-huh. 13 Q. Can you tell me about what transportation 14 access Panther Party members have? 15 MR. SEAQUIST: Form. 16 THE WITNESS: I mean, they have their 17 feet. They might have carpool. Some of them have cars. 18 The shuttle maybe, depending on where they're going. 19 But, you know, it just depends. There's variations. 20 Q. (BY MS. ADEN) So are there individual members 21 who do not own cars? 22 A. Yes. 23 Q. And is that consistent with your understanding 24 of other Prairie View AMU students? 25 MR. SEAQUIST: Object, leading.</p>	<p>1 A. The Panther Party in and of itself doesn't have 2 a lot of money. 3 Q. And you testified that Panther Party members 4 use their energy -- used their energy to work on behalf 5 of the party -- 6 A. Uh-huh. 7 Q. -- Panther Party with respect to the 2018 early 8 voting season. 9 A. Yes. 10 Q. Why -- what did you mean by energy? 11 A. Whether it was helping carpool, whether it's 12 helping promote what was going on, whether it was 13 helping just get out information. Different avenues, 14 they're using their energy and their time. 15 Q. And is that energy and time that they could 16 have been use -- that they could have used for something 17 else? 18 MR. SEAQUIST: Form. 19 THE WITNESS: Yes. 20 Q. (BY MS. ADEN) Like studying? 21 A. Like studying, self-care, whatever. 22 Q. Going to classes? 23 A. Yes. 24 Q. Engaging in extracurricular activities? 25 MR. SEAQUIST: Form.</p>
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<p>1 THE WITNESS: Yes, it is consistent. 2 Q. (BY MS. ADEN) You talked about some of the 3 resources that The Panther Party expended in the fall 4 2018 election season. Can you explain whether the 5 resources you expended were typical? 6 A. Typical of -- 7 MR. SEAQUIST: Form. 8 THE WITNESS: -- our normal resources? 9 Q. (BY MS. ADEN) That's correct. 10 A. No. They were more than we usually have to do, 11 especially when there's a get out the vote drive. 12 Q. Why? 13 A. Because we had to coordinate taking students 14 off campus, transportation. 15 Q. And that was because of the early voting 16 schedule. 17 A. Yes. 18 Q. You were asked earlier about whether Panther 19 Party members used their personal debit cards to pay for 20 things related to the 2018 early voting season. 21 A. Yes. 22 Q. Okay. Why would Panther Party members have to 23 use their own personal debit cards rather than the 24 resources of The Panther Party to carry out activities 25 related to the fall 2018 early voting schedule?</p>	<p>1 THE WITNESS: Correct. 2 Q. (BY MS. ADEN) Working? 3 A. Working, yes, correct. 4 MR. SEAQUIST: Form. 5 Q. (BY MS. ADEN) Why did you help put a bus 6 together to go to Hempstead? 7 A. Because of the early voting schedule. We 8 didn't feel it was adequate, so we tried to rectify that 9 with getting a bus to go take students to vote. 10 Q. And what do you mean by adequate? 11 A. We feel we didn't have enough days. 12 Q. And does that include days during the first 13 week of early voting? 14 MR. SEAQUIST: Leading. 15 THE WITNESS: Yes. 16 Q. (BY MS. ADEN) Was gas expended by Panther Party 17 leaders and members to drive people off campus? 18 A. Yes. I was one of them. 19 Q. Okay. And you said that you consider the time 20 and gas money that you and other Panther Party leaders 21 and members used to drive students to the polls was a 22 donation to The Panther Party. Is that accurate? 23 MR. SEAQUIST: Leading. 24 THE WITNESS: Yes. 25 Q. (BY MS. ADEN) Okay. And did other members --</p>

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<p>1 as far as you're aware, did those members who donated 2 time and gas -- did they consider those to be donations 3 to The Panther Party? 4 MR. SEAQUIST: Form, leading. 5 THE WITNESS: Yes. 6 Q. (BY MS. ADEN) And when you drove people, which 7 you mentioned doing, driving people off campus to vote, 8 did you consider that an action -- a donation being made 9 to The Panther Party? 10 MR. SEAQUIST: Leading. 11 THE WITNESS: Yes. 12 Q. (BY MS. ADEN) And did you consider that to be 13 an action that you were doing in your capacity as a 14 leader with The Panther Party? 15 MR. SEAQUIST: Leading. 16 THE WITNESS: Yes. 17 Q. (BY MS. ADEN) When you and other -- okay. 18 Strike that. 19 You mentioned that you used -- you and 20 other students used university printing to print out 21 flyers and other materials associated with the 2018 22 early voting election season. Is that accurate? 23 A. Yes. 24 Q. When you used the student printing accounts, 25 you yourself or other members of The Panther Party, did</p>	<p>1 THE WITNESS: Yes. 2 Q. (BY MS. ADEN) You talked several times, I 3 think, during your testimony today about there always 4 being an issue with voting with respect to Prairie View 5 students. What did you mean? 6 A. Ever since -- for decades, when it comes to -- 7 well, I mean, for over a century, but for decades we had 8 protests about voting. There's the -- it's always been 9 like felt there was voting discrimination over past 10 years. There's the zip code issue. There's always like 11 different issues that comes that we feel hinder us from 12 voting or making it hard for us to vote. 13 Q. How aware are Panther Party members, and the 14 student body more generally, of that history of voting 15 discrimination? 16 MR. SEAQUIST: Form. 17 THE WITNESS: Panther Party members are 18 very aware. Student body, to different degrees. Of 19 course, if you're a freshman on campus, you have to get 20 re-acclimated. So it's like every year you might have 21 four to five thousand new freshmen that are now learning 22 the history of Prairie View. So it's different degrees. 23 Q. (BY MS. ADEN) Those four or five thousand 24 students who enter the school each year, would they know 25 about when and how the Commissioners Court sets the</p>
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<p>1 you consider that to be something you were doing on 2 behalf of The Panther Party? 3 MR. SEAQUIST: Form. 4 THE WITNESS: Yes. 5 Q. (BY MS. ADEN) Okay. You didn't have exact 6 number -- it's accurate that you didn't have exact 7 numbers of how many volunteers or rides or voters that 8 were taken off campus to vote in the 2018 elections. Is 9 that accurate? 10 A. Correct. 11 Q. Okay. Would you say that there were 20 or more 12 volunteers who helped get voters off campus to vote in 13 the 2018 elections? 14 MR. SEAQUIST: Form. 15 THE WITNESS: That may be a good 16 guesstimate. 17 Q. (BY MS. ADEN) Would you say that there were 20 18 rides or more that were provided to take voters off 19 campus to vote in the 2018 election season? 20 MR. SEAQUIST: Form. 21 THE WITNESS: Yes. 22 Q. (BY MS. ADEN) Would you agree that at least 20 23 voters or more were taken off campus to vote during the 24 early voting season in the 2018 election season? 25 MR. SEAQUIST: Form.</p>	<p>1 early voting schedule? 2 MR. SEAQUIST: Form. 3 THE WITNESS: No, not -- not off -- not at 4 the beginning. They have to learn it. Hopefully 5 somebody tells them in their matriculation as a student 6 through Prairie View or they find out some way. 7 Q. (BY MS. ADEN) Would they know about that in 8 August of the fall semester as a freshman? 9 MR. SEAQUIST: Form. 10 THE WITNESS: No. 11 Q. (BY MS. ADEN) Would they know about that in 12 early September of the fall semester of their freshman 13 year? 14 MR. SEAQUIST: Form. 15 THE WITNESS: No, they wouldn't know about 16 that. 17 Q. (BY MS. ADEN) You testified -- just going back 18 to the resources that were expended to get students to 19 vote off campus during the 2018 early voting season, you 20 testified about people that came from Houston to help 21 people vote. Why was that? 22 A. They -- 23 MR. SEAQUIST: Form. 24 THE WITNESS: They felt there was a cause 25 that was -- they felt we were being discriminated</p>

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<p style="text-align: right;">Page 181</p> <p>1 against and it was a cause they wanted to lend their 2 hand and their resources, so they came from Houston and 3 different areas to come help us get to the polls. 4 Q. (BY MS. ADEN) And was that because of the 5 amount of early voting that Prairie View students had 6 access to on campus? 7 MR. SEAQUIST: Form. 8 THE WITNESS: Yes. 9 Q. (BY MS. ADEN) And was that because of the 10 access to transportation that was a barrier to students 11 voting off campus? 12 MR. SEAQUIST: Leading and form. 13 THE WITNESS: Yes. 14 Q. (BY MS. ADEN) Why would students be out of 15 town -- I think you testified that some students would 16 be out of town Monday through Wednesday around 10-29, 17 10-31 of the fall 2018 semester. Is that accurate? 18 A. Yes. 19 Q. Why would they be out of town? 20 A. They have different reasons. Some people just 21 choose to go home. There's multiple reasons people may 22 want to go out of town or just not may be on campus. 23 Q. Are there student activities that take people 24 off campus during the academic semester? 25 A. Yes. Sometimes you have a university trip that</p>	<p style="text-align: right;">Page 183</p> <p>1 the place that students want to participate in voting. 2 MR. SEAQUIST: Object to the form. 3 THE WITNESS: It's called the Memorial 4 Student Center. It's probably the place most students 5 frequent throughout the day. It's also a place we're 6 used to voting. Most times during an election we're 7 used to voting being at the MSC, so it's something that 8 we became used to. But it's the center of student life 9 at Prairie View. 10 Q. (BY MS. ADEN) And why do students frequent it? 11 Why is it the center of life? 12 MR. SEAQUIST: Form. 13 THE WITNESS: People eat there. A lot of 14 events happen there. Just it's a student center. 15 Q. (BY MS. ADEN) Do you have an opinion about the 16 size of parking at the Waller County Community Center as 17 compared to in or around the Memorial Student Center? 18 A. There's more parking at -- on Prairie View in 19 general. There's bigger parking lots in front of the 20 student center. I think in front of the Waller County 21 Community Center there's a pretty small parking lot. 22 Actually, it's smaller than the post office right next 23 to it. 24 Q. And how would you consider the actual interior 25 occupancy space of the Waller County Community Center as</p>
<p style="text-align: right;">Page 182</p> <p>1 will take people off campus out of state. 2 Q. You testified that you have been to the Waller 3 County Community Center. What is your opinion about 4 whether Panther Party or other PVAMU students use the 5 Waller County Community Center? 6 A. It's not a place we frequent. 7 Q. And is that something that you or PV -- or 8 Panther Party members communicated to Commissioner -- 9 members of the Commissioners Court? 10 A. Yes, I believe it was mentioned -- communicated 11 to the members of the Commissioners Court. 12 Q. And does that include during the fall 2018 13 season before -- during the fall 2018 election season? 14 MR. SEAQUIST: Leading. 15 THE WITNESS: Yes. 16 Q. (BY MS. ADEN) Did that include during the 17 Commissioners Court meeting that you testified at on 18 October 17th, 2018? 19 MR. SEAQUIST: Form and leading. 20 THE WITNESS: Yeah, I think we -- I know 21 just overall we advocated for the MSC. And anything 22 else recommended outside the MSC, like whether it was 23 the city hall or at the community center, wasn't really 24 advantageous for us. 25 Q. (BY MS. ADEN) Briefly describe why the MSC is</p>	<p style="text-align: right;">Page 184</p> <p>1 compared to voting at the Memorial Student Center? 2 MR. SEAQUIST: Form. 3 THE WITNESS: It pales in comparison. The 4 MSC is definitely larger than the Waller County 5 Community Center. 6 Q. (BY MS. ADEN) And say that the Waller County 7 Community Center -- strike that. 8 You testified to your awareness that 9 during the early voting election season any voter -- 10 registered voter in Waller County can testify -- can, 11 excuse me, vote at any of the early voting sites. Is 12 that correct? 13 A. During early voting, yes. 14 Q. Okay. And so assuming that anyone in Waller 15 County is going to come to the Waller County Community 16 Center to vote, do -- do you have an opinion about 17 whether or not the Waller County Community Center is a 18 sufficient place to welcome both Prairie View students 19 and non-Prairie View students to vote as compared to the 20 Memorial Student Center? 21 MR. SEAQUIST: Form. 22 THE WITNESS: Maybe repeat the question. 23 Q. (BY MS. ADEN) Yeah. It's a really bad 24 question. 25 A. Yeah.</p>



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<p style="text-align: right;">Page 185</p> <p>1 Q. What is your opinion about the capacity of the</p> <p>2 Waller County Community Center to welcome voters from</p> <p>3 Prairie View's campus and off of it as compared to the</p> <p>4 Memorial Student Center?</p> <p>5 MR. SEAQUIST: Form.</p> <p>6 THE WITNESS: So the Memorial Student</p> <p>7 Center in all regards, whether it's parking, whether</p> <p>8 it's capacity, whether it's knowing where it is, being</p> <p>9 used to it because a lot of people frequent it, when you</p> <p>10 say the MSC, people automatically understand what you're</p> <p>11 talking about.</p> <p>12 If I say Waller County Community Center, I</p> <p>13 may have to jog their memory. I might have to say "It's</p> <p>14 right next to the post office." I don't have to do that</p> <p>15 with the MSC. So the Waller County Community Center, in</p> <p>16 pretty much all regards across the board, is just a</p> <p>17 better place for people to frequent whether they're on</p> <p>18 campus or off campus.</p> <p>19 Q. (BY MS. ADEN) And you mentioned jogging the</p> <p>20 memory of folks. Is that students whose memory you have</p> <p>21 to jog about where the Waller County Community Center</p> <p>22 is?</p> <p>23 A. Yeah. Probably if I walked outside right now</p> <p>24 and talked to somebody about the Waller County Community</p> <p>25 Center, they probably wouldn't know.</p>	<p style="text-align: right;">Page 187</p> <p>1 MR. SEAQUIST: Form.</p> <p>2 THE WITNESS: They really don't like the</p> <p>3 shuttle, to be honest with you. It's just not a good</p> <p>4 avenue of this -- I guess you could call it a makeshift</p> <p>5 public transportation.</p> <p>6 Q. (BY MS. ADEN) Do the shuttle -- does the</p> <p>7 shuttle come when it -- the schedule says it's going to</p> <p>8 come?</p> <p>9 A. No, not all the time.</p> <p>10 Q. And does the shuttle -- well, strike that.</p> <p>11 A. I would say that if there's -- if you have an</p> <p>12 opportunity not to use the shuttle, you will take that</p> <p>13 opportunity.</p> <p>14 MR. SEAQUIST: Objection, nonresponsive.</p> <p>15 Q. (BY MS. ADEN) And have you -- with respect to</p> <p>16 your last answer, is that your understanding of the</p> <p>17 opinion of Panther Party members?</p> <p>18 MR. SEAQUIST: Form.</p> <p>19 THE WITNESS: Yeah. I would say I hear</p> <p>20 that a lot.</p> <p>21 Q. (BY MS. ADEN) You also -- I'm just jumping back</p> <p>22 to something you said. You talked about the public</p> <p>23 events that are held at the Memorial Student Center.</p> <p>24 Have you been to those public events?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 186</p> <p>1 Q. And are you aware through your work with The</p> <p>2 Panther Party or your time as a student here how it --</p> <p>3 does the -- does the Memorial Student Center host public</p> <p>4 events at it?</p> <p>5 A. Yes.</p> <p>6 Q. Would you consider that to be a frequent event?</p> <p>7 MR. SEAQUIST: Form.</p> <p>8 THE WITNESS: Does the -- does the MSC</p> <p>9 hold frequent events?</p> <p>10 Q. (BY MS. ADEN) That are open to the public?</p> <p>11 A. Yes.</p> <p>12 Q. You testified, I believe, about your</p> <p>13 understanding of the campus shuttle. And I believe you</p> <p>14 said that it was not consistent. What do you mean by</p> <p>15 that?</p> <p>16 A. I mean just over my years being here, I know</p> <p>17 sometimes like you might have two shuttles. Sometimes</p> <p>18 we have more or sometimes the route changed. It's just</p> <p>19 the -- it's not the most advantageous transportation. I</p> <p>20 mean, you use it if you have to; but if you have a</p> <p>21 different way to get somewhere, then you probably won't</p> <p>22 want to use the campus shuttle.</p> <p>23 Q. And what have you heard -- or what is your</p> <p>24 awareness about Panther Party members' opinion about the</p> <p>25 shuttle?</p>	<p style="text-align: right;">Page 188</p> <p>1 Q. Have you been to public events where hundreds</p> <p>2 of people have accessed the Memorial Student Center for</p> <p>3 a public event?</p> <p>4 A. Yes.</p> <p>5 Q. Have you been to a public event where thousands</p> <p>6 of people have accessed the Memorial Student Center for</p> <p>7 an event?</p> <p>8 MR. SEAQUIST: Form.</p> <p>9 THE WITNESS: I don't know the capacity of</p> <p>10 the MSC, but I would say -- I don't know about</p> <p>11 thousands, but I would say it would probably hit a</p> <p>12 thousand.</p> <p>13 Q. (BY MS. ADEN) Okay. I'm getting to the end.</p> <p>14 You mentioned speaking to Rosa Harris, the</p> <p>15 chair of the Democratic party, on -- on occasion. Is</p> <p>16 that accurate?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Have you ever spoken to -- do you know</p> <p>19 who the Republican party chair is?</p> <p>20 A. Not off the top. I think I've run across him,</p> <p>21 but I don't know his name.</p> <p>22 Q. Have you ever spoken to him?</p> <p>23 A. I can't say that I really have.</p> <p>24 Q. Have you ever seen him on campus?</p> <p>25 A. No, I wouldn't be able to say that.</p>

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<p style="text-align: right;">Page 189</p> <p>1 Q. When you've spoken to the Democratic party 2 chair, who initiates those communications? 3 A. The Democratic party chair. 4 Q. So you yourself or any member of The Panther 5 Party, have you -- are you aware of whether you have 6 affirmatively reached out to the party chair? 7 A. No, I couldn't say that we've reached out and 8 initiated conversations. 9 Q. You testified that she doesn't represent you as 10 a Democrat. Do you have an opinion about whether she 11 represents other Panther Party members or PVAMU students 12 as Democrats? 13 MR. SEAQUIST: Form. 14 THE WITNESS: It's a diverse body. So if 15 some students are Democrats, then they probably want 16 that party. But like I said, The Panther Party 17 represents the permanent interests of Prairie View. So 18 there could be -- you might find some permanent 19 interests that are on the conservative side. There 20 could be some on the liberal side. But she doesn't just 21 speak for the student body of Prairie View. 22 Q. (BY MS. ADEN) And that's true of the Republican 23 party chair as well? 24 A. Yes. 25 Q. And are you -- have you ever communicated that</p>	<p style="text-align: right;">Page 191</p> <p>1 get here, there's a lot going on. You're pretty much 2 getting settled for another year of school. So it's 3 pretty -- there's a lot going on as students in the 4 first and second weeks in the -- in the end of August -- 5 in the beginning of September, end of August, there's a 6 lot going on. 7 Q. (BY MS. ADEN) You testified about speaking to 8 Elections Administrator Eason about the 2018 schedule in 9 late September, early October. Is that accurate? 10 A. Yes. 11 Q. Okay. Did The Panther Party request more early 12 voting days during that conversation? 13 A. Yes. 14 Q. And what was Ms. Eason's response? 15 A. Ms. Eason -- she was actually favorable of the 16 request and she was seeing how -- she said that it was 17 possible to figure out the resources and logistics for 18 it, so she didn't see any problem with it. It was just 19 figuring out the logistics. 20 Q. And when you participated in the October 17th 21 meeting, did Ms. Eason recommend expansion of early 22 voting on campus during that meeting? 23 A. Yes. 24 Q. Was that successful? 25 A. No. The petition from her and also -- her</p>
<p style="text-align: right;">Page 190</p> <p>1 opinion or an opinion similar to that to the 2 Commissioners Court? 3 A. I know we said it at -- we said it at 4 Commissioners Court, and then I told Rosa Harris 5 directly after Commissioners Court. 6 Q. And when you talk about at the Commissioners 7 Court, when you mention that, you're talking about at 8 the October 17th meeting? 9 A. Yes. 10 Q. You talked about The Panther Party not being 11 able to officially meet until after the 12th class day. 12 A. Uh-huh. 13 Q. Are you aware of when the Commissioners Court 14 sets the early voting schedule? 15 A. I'm not aware. I think -- I think it was 16 sometime in August maybe, but I'm not fully aware. 17 Q. And would setting the schedule in late August 18 or early September allow Panther Party members -- not 19 just first-year Panther Party student members, but 20 Panther Party members or leaders, to weigh in on the 21 setting of the schedule? 22 MR. SEAQUIST: Form. 23 THE WITNESS: So I would say no because, 24 first of all, you're -- it's over the summer, so you're 25 not even -- you're not on campus yet. And then when you</p>	<p style="text-align: right;">Page 192</p> <p>1 recommendation and also the -- our petition was denied 2 by -- by Commissioners Court. 3 Q. And what were some of the reasons that you 4 heard for denying the expansion of early voting on 5 campus? 6 MR. SEAQUIST: Form. 7 THE WITNESS: To be honest, it was a lot 8 of -- it sounded like a lot of BS. But it was -- 9 somebody brought up something about Pine Island. We 10 didn't see how that was relevant. I really didn't see 11 any reason why they couldn't do it, to be honest with 12 you, other than they just didn't want to do it. 13 Q. (BY MS. ADEN) Why do you think they didn't want 14 to do it? 15 MR. SEAQUIST: Form. 16 THE WITNESS: I would say they didn't want 17 to do it was because -- there's a few reasons. I think 18 they were -- in a sense, they made it a -- it was like a 19 Democrat versus Republican thing. And -- but we came 20 there to clear it up and say, "No, we're not here even 21 speaking on that. We're here advocating for students." 22 That kind of went over their heads. 23 And then I guess they -- I really don't 24 know why they didn't want to do it. Just me personally, 25 I didn't see a reason why they wouldn't do it. It</p>

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<p style="text-align: right;">Page 193</p> <p>1 seemed like something -- especially after the</p> <p>2 recommendation from Christy Eason, saying that she could</p> <p>3 do it because she was the one pretty much that would</p> <p>4 have knowledge of what the election office could do.</p> <p>5 And after she gave that reason, like any reason that</p> <p>6 they have -- that they had was just kind of, okay,</p> <p>7 you're only -- you're only the election office. They</p> <p>8 could do it. So now why are you saying no?</p> <p>9 MR. SEAQUIST: Objection, nonresponsive.</p> <p>10 Q. (BY MS. ADEN) You testified about speaking to</p> <p>11 Commissioner Barnett at the October 17th meeting, both</p> <p>12 during the meeting and afterwards. And what did he say</p> <p>13 back to you?</p> <p>14 A. Probably a lot of political answers, but</p> <p>15 nothing that really -- really addressed our -- our</p> <p>16 displeasure. I pretty much just told him that we were</p> <p>17 displeased with his decision and we thought the reasons</p> <p>18 that he gave on Commissioners Court were a bunch of BS.</p> <p>19 Q. And outside of just -- well, you mentioned</p> <p>20 speaking to county officials about concerns and</p> <p>21 interests that The Panther Party has. Who were -- who</p> <p>22 were those officials?</p> <p>23 A. The elections commissioner, people on the</p> <p>24 Commissioners Court, Trey Duhon. That's pretty much</p> <p>25 the -- the general -- the general game.</p>	<p style="text-align: right;">Page 195</p> <p>1 THE WITNESS: How would I say they've</p> <p>2 responded to it? I mean, they necessarily didn't shut</p> <p>3 them down, but I guess as a -- as a politician, you want</p> <p>4 to seem interested anyway, so I couldn't -- I guess they</p> <p>5 would sound interested.</p> <p>6 Q. (BY MS. ADEN) Have they acted on any of the</p> <p>7 concerns or issues that you have raised?</p> <p>8 MR. SEAQUIST: Form.</p> <p>9 THE WITNESS: I would say that -- I would</p> <p>10 answer it this way. For the most part we really only</p> <p>11 feel as students that we only see elected officials</p> <p>12 during voting season and we don't see them a lot after</p> <p>13 that. So they don't really have a lot of time to</p> <p>14 interact and actually put things in place because we</p> <p>15 don't see them unless it's time to get our vote.</p> <p>16 Q. (BY MS. ADEN) And that's both parties?</p> <p>17 A. Yes, both parties.</p> <p>18 Q. You testified that members spoke at the Parade</p> <p>19 of Voters on -- in the lead-up to the -- or during the</p> <p>20 fall 2018 election season. What did you hear them say?</p> <p>21 A. Pretty much we felt Waller County was</p> <p>22 discriminating against us and making it hard for us to</p> <p>23 vote and that we needed to do all we can to overcome it</p> <p>24 and not allow it to just set us back or not just take it</p> <p>25 lying down. There was pretty much a lot of motivational</p>
<p style="text-align: right;">Page 194</p> <p>1 Q. And you spoke to them about voting issues?</p> <p>2 A. Yes.</p> <p>3 Q. Have you spoken with them about community</p> <p>4 development issues?</p> <p>5 A. Yes.</p> <p>6 Q. Have you spoken to them about economic</p> <p>7 development issues?</p> <p>8 A. Yes.</p> <p>9 Q. And those would be issues consistent with the</p> <p>10 mission of The Panther Party.</p> <p>11 A. Yes.</p> <p>12 Q. And can you tell me briefly what some of the</p> <p>13 issues that you have raised with them were?</p> <p>14 A. We had conversations about the bail bond. I</p> <p>15 know we've spoken with Commissioner Barnett about some</p> <p>16 community development issues when he came here, just</p> <p>17 seeing different ways how we can partner and he as a</p> <p>18 representative can get some things going.</p> <p>19 So I mean, it's a -- it's a wide array of</p> <p>20 things. But there's been a lot of conversations or a</p> <p>21 few conversations about different things outside of just</p> <p>22 voting.</p> <p>23 Q. And how would you say they have responded to</p> <p>24 the concerns and issues that you have raised?</p> <p>25 MR. SEAQUIST: Object to the form.</p>	<p style="text-align: right;">Page 196</p> <p>1 speeches and rallying going on, protest type speeches.</p> <p>2 Q. And do you see the decision to -- strike that.</p> <p>3 Do you view -- does The Panther Party view</p> <p>4 the adoption and maintenance of the early voting</p> <p>5 schedule in the fall of 2018 to be part of the history</p> <p>6 of discrimination that Prairie View students have</p> <p>7 experienced?</p> <p>8 MR. SEAQUIST: Form, leading.</p> <p>9 THE WITNESS: Yes.</p> <p>10 Q. (BY MS. ADEN) And does that history of</p> <p>11 discrimination include discrimination in the last 10</p> <p>12 years?</p> <p>13 A. Yes.</p> <p>14 Q. In the last 20 years?</p> <p>15 A. Yes.</p> <p>16 Q. In the last 30 years?</p> <p>17 A. In the last 150 years.</p> <p>18 Q. You testified about the route that students</p> <p>19 marched as part of the Parade of Voters. Do you have an</p> <p>20 opinion about whether Prairie View A&amp;M students,</p> <p>21 including Panther Party members, should have to march to</p> <p>22 vote?</p> <p>23 MR. SEAQUIST: Form.</p> <p>24 THE WITNESS: No.</p> <p>25 Oh, do I have an opinion? Yes, I have an</p>

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<p>1 opinion. They shouldn't have to march to vote.</p> <p>2 Q. (BY MS. ADEN) Why not?</p> <p>3 A. Because if you're marching to vote, it should</p> <p>4 be something that's made easier. The reason we were</p> <p>5 marching to vote was to overcome an obstacle and to</p> <p>6 rally people around overcoming that obstacle because we</p> <p>7 felt that obstacles were put in our path by Waller</p> <p>8 County.</p> <p>9 Q. And even though you overcame that obstacle, you</p> <p>10 and other members, by actually being able to cast a</p> <p>11 ballot, do you still think it's discrimination that you</p> <p>12 had to overcome obstacles to vote?</p> <p>13 MR. SEAQUIST: Leading, form.</p> <p>14 THE WITNESS: Do I think it's</p> <p>15 discrimination that I had to come -- yes, I think it's</p> <p>16 discriminatory that I have to overcome obstacles even</p> <p>17 though we overcame then.</p> <p>18 Q. (BY MS. ADEN) You testified that you get in</p> <p>19 trouble for walking on the grass. Is that accurate?</p> <p>20 A. Yes.</p> <p>21 Q. Can you explain what you mean?</p> <p>22 A. It's more so just a culture. We want to -- we</p> <p>23 take pride in our grass. And then we also have this --</p> <p>24 whether it's true or not, that it was built on a slave</p> <p>25 cemetery or whatever have you. But we try to encourage</p>	<p>1 Muslim, it's -- we take what's called a holy name or a</p> <p>2 name of our culture because when we came over here as</p> <p>3 slaves, we had names of culture; but because we were</p> <p>4 owned by people with the last names like Perkins, that</p> <p>5 means I was owned by somebody with the last name Perkins</p> <p>6 and they gave us that name to denote us as property.</p> <p>7 If somebody else -- a white person's name</p> <p>8 was Perkins, it's an English name. That means they came</p> <p>9 from England. My people didn't come from England. So I</p> <p>10 reject those names because it's not the name of my</p> <p>11 people. It's the name of people who enslaved my people</p> <p>12 and said "I own you, so I'm going to give you my name."</p> <p>13 Like you own a -- you name a dog because</p> <p>14 you own it. They named us because they owned us. But</p> <p>15 as a free man, I reject that, so I use a name of</p> <p>16 culture. When we came over here, either we were</p> <p>17 Muslims --</p> <p>18 (Interruption by the reporter)</p> <p>19 THE WITNESS: So when we came over here,</p> <p>20 either we were Muslims or we had African names of</p> <p>21 African culture and so we want to take those names back</p> <p>22 instead of using the names that were given to us by our</p> <p>23 former slave masters.</p> <p>24 Q. (BY MS. ADEN) And even though slavery was</p> <p>25 legally outlawed some time ago, that history still</p>
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<p>1 people not to walk on our grass just to respect Prairie</p> <p>2 View as a whole.</p> <p>3 Q. So you mentioned slavery and enslavement. What</p> <p>4 do you mean by that?</p> <p>5 A. Prairie View was a slave plantation called --</p> <p>6 well, Prairie View itself was a slave plantation called</p> <p>7 Alta Vista. Actually the whole Waller County -- and I</p> <p>8 have a mentor that can go more in depth into the history</p> <p>9 of Prairie View.</p> <p>10 But the whole Waller County was -- used to</p> <p>11 be owned by a man named Edwin Gross. Actually Waller</p> <p>12 is, I think, either his nephew or whatever have you.</p> <p>13 But from Prairie View, Hempstead, pretty much the whole</p> <p>14 area was a large slave plantation and then Alta Vista</p> <p>15 was just a section of the larger slave plantation.</p> <p>16 Q. Related to slavery, are you aware of whether</p> <p>17 lynchings have occurred in Waller County?</p> <p>18 A. Yeah. I think Waller County actually had one</p> <p>19 of the highest rates of lynchings maybe in Texas or the</p> <p>20 nation. But Waller County has been known for lynchings.</p> <p>21 Q. Finally, or I think close to finally, you</p> <p>22 mentioned hating using the last name Perkins.</p> <p>23 A. Yes.</p> <p>24 Q. Why is that?</p> <p>25 A. As a -- as a Muslim, when I joined -- became a</p>	<p>1 resonates with you today?</p> <p>2 A. Yes, the fact that I still have to have Perkins</p> <p>3 on my ID.</p> <p>4 MS. ADEN: I think that's it. Thank you.</p> <p>5 THE WITNESS: Thank you.</p> <p>6 MR. SEAQUIST: We will reserve the rest of</p> <p>7 our questions for trial.</p> <p>8 (Proceedings concluded at 1:40 p.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 CHANGES AND CORRECTIONS	1 IN THE UNITED STATES DISTRICT COURT
2 WITNESS NAME: DATE OF DEPOSITION:	2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 JOSHUA JAMIL MUHAMMAD OCTOBER 10, 2019	3 HOUSTON DIVISION
4 PAGE LINE CHANGE REASON	4 JAYLA ALLEN, DAMON )
5	5 JOHNSON, TREASURE SMITH, )
6	5 AND THE PANTHER PARTY, )
7	6 Plaintiffs, )
8	6 VS. ) CIVIL ACTION NO.:
9	7 ) 4:18-CV-3985
10	8 WALLER COUNTY TEXAS; THE )
11	8 WALLER COUNTY )
12	9 COMMISSIONERS COURT; )
13	9 JUDGE CARBETT "TREY" J. )
14	10 DUHON III, IN HIS )
15	10 OFFICIAL CAPACITY AS THE )
16	11 WALLER COUNTY JUDGE; AND )
17	11 CHRISTY A. EASON, IN HER )
18	12 OFFICIAL CAPACITY AS THE )
19	12 WALLER COUNTY ELECTIONS )
20	13 ADMINISTRATOR, )
21	13 Defendants. )
22	14 *****
23	15 REPORTER'S CERTIFICATION
24	16 ORAL DEPOSITION OF JOSHUA JAMIL MUHAMMAD
25	17 OCTOBER 10, 2019
	18 *****
	19 I, SHERRI SANTMAN FISHER, Certified Shorthand
	20 Reporter in and for the State of Texas, hereby certify
	21 to the following:
	22 That the witness, JOSHUA JAMIL MUHAMMAD, was duly
	23 sworn by the officer and that the transcript of the oral
	24 deposition is a true record of the testimony given by
	25 the witness;
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1 I, JOSHUA JAMIL MUHAMMAD, have read the	1 I further certify that pursuant to FRCP Rule
2 foregoing deposition and hereby affix my signature that	2 30(f)(1) that the signature of the deponent:
3 same is true and correct, except as noted above.	3 <u>  X  </u> was requested by the deponent or a party
4	4 before the completion of the deposition and returned
5	5 within 30 days from date of receipt of the transcript.
6	6 If returned, the attached Changes and Signature Page
7 JOSHUA JAMIL MUHAMMAD	7 contains any changes and the reasons therefor;
8	8 <u>          </u> was not requested by the deponent or a party
9 THE STATE OF _____)	9 before the completion of the deposition.
10 COUNTY OF _____)	10 That the amount of time used by each party at the
11	11 deposition is as follows:
12 Before me, _____, on this	12 MS. LEAH ADEN.....0 Hours, 28 Minutes
13 day personally appeared JOSHUA JAMIL MUHAMMAD, known to	13 MR. GUNNAR P. SEAQUIST.....3 Hours, 36 Minutes
14 me (or proved to me under oath or through	14 I further certify that I am neither counsel for,
15 _____) (description of identity	15 related to, nor employed by any of the parties or
16 card or other document)) to be the person whose name is	16 attorneys in the action in which this proceeding was
17 subscribed to the foregoing instrument and acknowledged	17 taken, and further that I am not financially or
18 to me that they executed the same for the purposes and	18 otherwise interested in the outcome of the action.
19 consideration therein expressed.	19 Certified to by me this 20th of October, 2019.
20 Given under my hand and seal of office this	20
21 _____ day of _____, _____.	21
22	22
23	23
24	24
25	25
NOTARY PUBLIC IN AND FOR	SHERRI SANTMAN FISHER, Texas CSR 2336
THE STATE OF _____	CSR Expiration Date: 12/31/19
COMMISSION EXPIRES: _____	COOLEY REPORTING, Firm No. 702
	8407 Fathom Circle, Unit B
	Austin, Texas 78750
	512-743-5867/512-410-3012





William F. Calve, NORTON ROSE FULBRIGHT US LLP, 300 Convent Street, Suite 2100, San Antonio, Texas 78205-3792, Telephone: (210) 270-7132, Facsimile: (210) 270-7205, [william.calve@nortonrosefulbright.com](mailto:william.calve@nortonrosefulbright.com)

Please take notice that Defendants, Waller County, Texas, the Waller County Commissioners Court, Judge Carbett "Trey" J. Duhon III, in his official capacity as the Waller County Judge, and Christy A. Eason, in her official capacity as the Waller County Elections Administrator ("Defendants"), in the above-titled and numbered cause, by and through their attorneys of record, will take the oral deposition of the Panther Party ("Plaintiff"), on Thursday, October 10, 2019, beginning at 9:00 a.m. Central Time, at University Square (Clubhouse), Prairie View A&M University, 512 Anne Preston Street, Prairie View, TX 77445.

The deposition shall be taken before a court reporter, will be recorded stenographically, and continued from day to day until completed. All parties are invited to attend and propound such questions to the witness as may be appropriate under the Federal Rules of Civil Procedure.

The deposition will be taken pursuant to Federal Rule of Civil Procedure 30(b)(6) and will cover the topics identified on Exhibit A to this notice, which is incorporated herein. Plaintiff, must designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, to testify regarding the topics set forth in Exhibit A; Plaintiff may also set out the matters on which each person designated will testify. Whomever Plaintiff designates to testify must be prepared to testify regarding information known or reasonably available to Plaintiff.

Respectfully submitted,

BICKERSTAFF HEATH  
DELGADO ACOSTA LLP  
3711 South MoPac Expressway  
Building One, Suite 300  
Austin, Texas 78746  
512-472-8021 (Telephone)  
512-320-5638 (Facsimile)

By: /s/ Gunnar P. Seaquist  
Gunnar P. Seaquist  
Texas State Bar No. 24043358  
Southern District No: 1140733  
gseaquist@bickerstaff.com  
C. Robert Heath  
Texas State Bar No. 09347500  
Southern District No. 13381  
bheath@bickerstaff.com

**ATTORNEYS FOR ALL DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that on October 3, 2019, a true and correct copy of the foregoing document was served on all counsel of record via email.

/s/ Gunnar P. Seaquist  
Gunnar P. Seaquist



**Exhibit A**

1. The causes of action asserted by Plaintiff against Defendants in this lawsuit, as well as any underlying facts alleged by Plaintiff in its live pleading.
2. The factual bases supporting Plaintiff's claims against Defendants.
3. Plaintiff's organizational records, including but not limited to Plaintiff's formation documents, bylaws, membership lists, financial records, operational records, and records of regularly conducted activities.
4. Plaintiff's responses to written discovery propounded in this case.
5. Plaintiff's formation and history of the organization.
6. Plaintiff's organizational structure and operations.
7. The composition of Plaintiff's membership, and requirements and procedures for membership.
8. The schedule, nature, agendas, and content of Plaintiff's meetings.
9. The organizational activities of Plaintiff, including but not limited to education, activism, or advocacy by, or on behalf of, Plaintiff.
10. Plaintiff's communications, including but not limited to communications with Waller County and its officials, employees, agents, or representatives, as well as Plaintiff's communication with Prairie View A&M and its officials, employees, agents, or representatives, and Plaintiff's communications with its members or other students or alumni of Prairie View A&M, and Plaintiff's communications with the City of Prairie View and its officials, employees, agents, or representatives.
11. Any trainings, events, educational meetings, or other activities by Plaintiff.
12. Plaintiff's actions and activities, if any, in connection with any elections in Waller County or elsewhere.
13. Plaintiff's actions and activities, if any, in connection with early voting in Waller County or elsewhere.
14. Plaintiff's financial records and activities, including but not limited to assets, liabilities, cash flows, expenditures, fundraising, and tax status.
15. Plaintiff's social media activities, or other marketing, promotional, or informational activities.





admissible evidence, and/or unlimited in time or scope.

3. Plaintiff objects to the Interrogatories to the extent that they seek documents or information that is not currently in its possession, custody, or control.

4. Plaintiff objects to the Interrogatories to the extent that they call for documents or information that are already in Defendant Waller County's or other Defendants' possession, custody, or control, or are otherwise publicly available to Defendants.

5. Plaintiff objects to the Interrogatories to the extent that they impose any requirements or discovery obligations other than those specified in the Federal Rules of Civil Procedure the Scheduling Order, and/or related agreements.

6. Plaintiff objects to the Interrogatories to the extent that they seek expert information that is not discoverable from Plaintiff individually under the Federal Rules of Civil Procedure.

7. Plaintiff objects to the Interrogatories to the extent that they seek confidential, proprietary business information, and/or information protected by any privacy and/or confidentiality laws, provisions, and/or regulations. If any confidential or proprietary information is produced without an appropriate designation, Plaintiff reserves the right to designate any information as confidential.

8. Plaintiff objects to Defendants' Definitions and Instructions to the extent that they request documents or information that would be protected from discovery by the attorney-client privilege, attorney work product doctrine, and/or any other applicable privilege.

9. Plaintiff objects to Defendants' definitions of "documents," "communication," and "identify" as being vague, ambiguous, unduly overbroad, and confusing.

10. Plaintiff objects to the extent that any of the Interrogatories seek information that is protected by the right to freely associate under the First Amendment, is confidential, or otherwise is protected, or is neither relevant nor reasonably calculated to lead to the discovery of admissible

evidence in this action.

11. Plaintiff has attempted in good faith to fully answer Defendants' Interrogatories. The answers are based on information currently available after a reasonable search. Pursuant to Federal Rule 26, Plaintiff reserves the right to alter or supplement its responses as additional documents become available and in light of facts not now known, the relevance to the subject matter or the relationship to admissible evidence of which has not yet been ascertained but may subsequently be discovered.

12. By answering these Interrogatories, Plaintiff does not concede the relevance or materiality of the information requested, nor of the subject matter to which the interrogatory refers. Rather, the responses are made expressly subject to, and without in any way waiving or intending to waive any question or objection as to the competency, relevancy, privilege, or admissibility as evidence, of any of the matters referred to in the responses.

13. Plaintiff incorporates herein by reference each of the above objections into each response set forth below, and all the responses below are subject to the foregoing "General Objections." These General Objections will not necessarily be repeated or referred to in the responses to the individual Interrogatories. The presence or absence of specific reference to one or more of the General Objections is not at any point intended to waive, withdraw, or abandon any of the General Objections.



## **RESPONSE TO INTERROGATORIES**

### **INTERROGATORY NO. 1**

Identify each person who participated in any way in answering this first set of interrogatories, or supplied any documents or information used in answering these interrogatories.

### **ANSWER TO NO. 1**

Plaintiff objects to Interrogatory No. 1 to the extent that it seeks information that is neither relevant to the issues in this dispute nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to Interrogatory No. 1 to the extent it falls outside the scope of this litigation and imposes obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. In addition, Plaintiff objects to Interrogatory No. 1 to the extent that it seeks the disclosure of information protected by any privilege or immunity, including attorney-client privilege, attorney work product protection, common interest privilege, or any other privilege, immunity, principle, doctrine, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff identifies the following individuals: Joshua Mohammed, in his capacity as Chairman of Board of the Panther Party and as a founding member of the Panther Party; Plaintiff's counsel.

### **INTERROGATORY NO. 2**

Identify all persons or entities that Plaintiff believes have documents, information, or other materials relevant to this suit, and identify the documents, information, or other materials they possess.

### **ANSWER TO NO. 2**

Plaintiff objects to Interrogatory No. 2 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Plaintiff further objects to this Interrogatory as unreasonable and unduly burdensome to the extent it seeks the identity of all individuals who may have knowledge about the facts alleged in Plaintiffs' Complaint. Plaintiff further objects to Interrogatory No. 2 because it is not time limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome given the lengthy history of voting discrimination and early voting issues in Waller County.

In addition, Plaintiff objects to Interrogatory No. 2 to the extent that it seeks information protected from disclosure by any privilege or immunity, including attorney-client privilege, attorney work product protection, common interest privilege, or any other privilege, immunity,

principle, doctrine, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that information responsive to Interrogatory No. 2 will be provided in Plaintiffs' First Supplement to Their Initial Disclosures, which Plaintiff's counsel will disclose to Defendants.

### **INTERROGATORY NO. 3**

Please describe the organization of the Panther Party, including the identity of its founders, the leadership structure and persons occupying the positions of leadership, and the number of current members.

### **ANSWER TO NO. 3**

Plaintiff objects to Interrogatory No. 3 to the extent that it seeks information on Plaintiff's individual members, the compelled disclosure of which "is likely to affect adversely the ability of [Plaintiff] and its members to pursue their collective effort to foster beliefs which they admittedly have the right to advocate, in that it may induce members to withdraw from [Plaintiff] and dissuade others from joining it because of fear of exposure of their beliefs shown through their associations and of the consequences of this exposure." *NAACP v. State of Alabama ex rel. Patterson*, 357 U.S. 449, 462-63 (1958). Plaintiff further objects to Interrogatory No. 3 to the extent it requires the disclosure of protected material, including but not limited to confidential information or any information implicating privacy interests.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that the Panther Party was founded in 2017 by two Prairie View A&M ("PVAMU") undergraduate students, Joshua Mohammed and Ervin Bryant. Plaintiff's leadership structure includes four officers: President, Tajuan Burton; Vice-President, Maydrian Lowe; Secretary, to be filled in the fall of 2019; and Treasurer; to be filled in the fall of 2019. Based on the 2018-2019 school year, there are approximately twenty active members.

### **INTERROGATORY NO. 4**

Please identify any office or meeting space owned, leased, or used by the organization of the Panther Party from January 1, 2015 through the present.

### **ANSWER TO NO. 4**

Plaintiff objects to Interrogatory No. 4 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Plaintiff further objects to this Interrogatory to the extent that it seeks information that is neither relevant to the issues in this dispute nor reasonably calculated to lead to the discovery of admissible evidence.



Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that it does not own or lease any office or meeting space and has not done so since its founding in 2017. Moreover, Plaintiff does not have a specific designated room for its office either on or off of the PVAMU campus. Instead, Plaintiff uses various available, student-designated meeting rooms on the PVAMU campus to hold meetings.

**INTERROGATORY NO. 5**

Please describe the process for joining the Panther Party, including the application or membership process, the requirements for participation or membership, any fees, dues, or other financial contributions required or suggested to join the Panther Party.

**ANSWER TO NO. 5**

Plaintiff objects to Interrogatory No. 5 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Additionally, Plaintiff objects to Interrogatory No. 5 because it is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff further objects to Interrogatory No. 5 because it is not limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff also objects to Interrogatory No. 5 because it is neither relevant to the issues in this dispute nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that the process for joining the Panther Party includes two steps: (1) attend an entrance meeting; and (2) after that meeting, sign up for the club by providing the student's name and email address. Initially, during the 2017-2018 school year, Plaintiff required a \$10 annual membership fee, but it waived that fee for all members during the 2018-19 school year.

Aside from being a PVAMU undergraduate, graduate, or former student, there are no other participation requirements. In addition to attending meetings, members can join one of three committees: (1) the community development committee, (2) the economic development committee, and (3) the political engagement committee.

**INTERROGATORY NO. 6**

Please identify any and all records, including membership records and records of activities, kept by the Panther Party.

**ANSWER TO NO. 6**

Plaintiff objects to Interrogatory No. 6 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules



of the U.S. District Court for the Southern District of Texas. Plaintiff further objects to this Interrogatory as unreasonable and unduly burdensome to the extent it seeks the identity of any individual who may have knowledge about the facts alleged in Plaintiff's Complaint. Plaintiff further objects to Interrogatory No. 6 because it is not time limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome given the lengthy history of voting discrimination and early voting issues in Waller County.

Additionally, Plaintiff objects to Interrogatory No. 6 to the extent that it seeks documents or information protected from disclosure by any privilege or immunity, including attorney-client privilege, attorney work product protection, common interest privilege, or any other privilege, immunity, principle, doctrine, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Plaintiff further objects to Interrogatory No. 6 to the extent that it seeks information on Plaintiff's individual members, the compelled disclosure of which "is likely to affect adversely the ability of [Plaintiff] and its members to pursue their collective effort to foster beliefs which they admittedly have the right to advocate, in that it may induce members to withdraw from [Plaintiff] and dissuade others from joining it because of fear of exposure of their beliefs shown through their associations and of the consequences of this exposure." *NAACP v. State of Alabama ex rel. Patterson*, 357 U.S. 449, 462-63 (1958). Plaintiff further objects to Interrogatory No. 6 to the extent it requires the disclosure of protected material, including but not limited to confidential information or any information implicating privacy interests.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that the organization maintains records of its formation and organization, membership records, financial records, meeting minutes, and social media or other public releases, postings and responses.

#### **INTERROGATORY NO. 7**

Please identify any and all sources of revenue or funding of the Panther Party.

#### **ANSWER TO NO. 7**

Plaintiff objects to Interrogatory No. 7 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Additionally, Plaintiff objects to Interrogatory No. 7 because the Request is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff further objects to Interrogatory No. 7 because it is not limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff also objects to Interrogatory No. 7 because it is neither relevant to the issues in this dispute nor reasonably calculated to lead to the discovery of admissible evidence.

In addition, Plaintiff objects to Interrogatory No. 7 to the extent that it seeks documents

or information protected from disclosure by any privilege or immunity, including common interest privilege, or any other privilege, immunity, principle, doctrine, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that it does not receive an annual budget from PVAMU. Instead, it must apply to PVAMU for discretionary funding on a case-by-case basis. During the 2017-2018 school year, Plaintiff relied on membership dues of \$10 per person. During the 2018-2019 school year, Plaintiff did not rely on any membership dues because it waived the annual fee for all members. In addition, Plaintiff raises funds through events and, on rare occasions, through donations. Otherwise, Plaintiff's members offset costs by volunteering their time, energy, and skills.

#### **INTERROGATORY NO. 8**

Please identify any banking or other accounts held by or for the benefit of the Panther Party.

#### **ANSWER TO NO. 8**

Plaintiff objects to Interrogatory No. 8 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Additionally, Plaintiff objects to Interrogatory No. 8 because the Interrogatory is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff further objects to Interrogatory No. 8 because it is not limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff also objects to Interrogatory No. 8 because it is neither relevant to the issues in this dispute nor reasonably calculated to lead to the discovery of admissible evidence.

In addition, Plaintiff objects to Interrogatory No. 8 to the extent that it seeks documents or information protected from disclosure by any privilege or immunity, including common interest privilege or any other privilege, immunity, principle, doctrine, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that it has a single bank account.

#### **INTERROGATORY NO. 9**

Please identify the members of the Panther Party, including name, age, address, and telephone number, from January 1, 2017 through the present.



**ANSWER TO NO. 9**

Plaintiff objects to Interrogatory No. 9 and will not be responding in full to this Interrogatory because it seeks Plaintiff's membership list, the compelled disclosure of which would "abridge the rights of its . . . members to engage in lawful association in support of their common beliefs," which is protected by the First Amendment to the U.S. Constitution. *NAACP v. State of Alabama ex rel. Patterson*, 357 U.S. 449, 460 (1958); *see id.* at 462-63 (holding "that compelled disclosure of [a civil rights association's] membership is likely to affect adversely the ability of [the association] and its members to pursue their collective effort to foster beliefs which they admittedly have the right to advocate, in that it may induce members to withdraw from the [a]ssociation and dissuade others from joining it because of fear of exposure of their beliefs shown through their associations and of the consequences of this exposure."). Plaintiff further objects to Interrogatory No. 9 to the extent it requires the disclosure of protected material, including but not limited to confidential information or any information implicating privacy interests.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that Joshua Mohammed, who serves as Chairman of the Board, is a founding and current member of organizational Plaintiff. Moreover, Jayla Allen, Damon Johnson, and Treasure Smith are individual Plaintiffs in this action and current or former members of the Panther Party. Those individuals can be contacted through Plaintiffs' counsel. Finally, consistent with the response to Interrogatory No. 3, based on the 2018-2019 school year, there are approximately twenty active members in the Panther Party.

**INTERROGATORY NO. 10**

Other than assisting students in voting, as alleged in Paragraph 17 of Plaintiffs' First Amended Complaint, please describe in detail the activities of the Panther Party.

**ANSWER TO NO. 10**

Plaintiff objects to Interrogatory No. 10 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Plaintiff further objects to this Interrogatory as vague, ambiguous, overly broad, and unduly burdensome.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that its mission statement is to serve the PVAMU community and community members in the city of Prairie View and to address the social, political, economic, and historical landscape of PVAMU, the Texas A&M Collegiate System, and Waller County. Central to this mission, Plaintiff's members may join the Community Development, Economic Development, and/or Political Engagement Committees. The Community Development's focus is to improve the standard of life of the Prairie View community by working to make the city and the campus a safe and decent place to live for residents and students. Students in the committee go out into the committee weekly with a volunteer program called "Picking Up the Pieces" to build bridges between PVAMU and the city. This provides an opportunity for members to connect with other



PVAMU students, as well City of Prairie View residents. The Economic Development Committee works to promote the growth of business and entrepreneurship in Prairie View and works with students, city residents, and officials to provide resources for business development on multiple levels. The Political Engagement Committee, among other activities, conducts voter education and voter registration drives on campus at PVAMU. For example, in April of 2018, this Committee hosted a voters-only party to encourage students to participate in the city, county, and primary elections.

#### **INTERROGATORY NO. 11**

Please state each way in which the Panther Party “diverted its modest organizational...resources to assisting PVAMU student voters by hosting trainings, organizing group transportation to early voting locations and conducting other educational and organizing activities...” as alleged in paragraph 17 of Plaintiffs’ First Amended Complaint. Your answer should identify each training, educational, transportation and organizing activities conducted by The Panther Party in anticipation of the general election, and how those activities differed or diverted from the Panther Party’s normal activities.

#### **ANSWER TO NO. 11**

Plaintiff objects to Interrogatory No. 11 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Plaintiff further objects to Interrogatory No. 11 because it is not limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome.

In addition, Plaintiff objects to Interrogatory No. 11 to the extent that it seeks documents, records, or information protected from disclosure by any privilege or immunity, including attorney-client privilege, attorney work product protection, common interest privilege, or any other privilege, immunity, principle, doctrine, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Subject to and without waiving Plaintiff’s foregoing general and specific objections, Plaintiff responds that since its founding in 2017 and consistent with its organizational mission, it regularly engages in general voter registration and voter education activities, including voter registration drives and candidate forums. In addition, due to recent confusion about the validity of voter registrations based on continuing issues surrounding rural zip codes in Waller County, Plaintiff engaged with students and aided in efforts to resolve these concerns prior to or on election days.

In the 2018 general election, however, Plaintiff had to divert resources away from these regular activities to address the complete absence of early voting on campus during the first week of early voting and the limited amount of early voting on PVAMU’s campus during the second week. Consequently, Plaintiff’s members volunteered their time and other resources (for example,



cars, gas money) to drive students to off-campus polling locations during the first week of early voting. These students would have otherwise been unable to cast a vote because of their other obligations (for example, class schedules, work obligations) and lack of access to transportation.

Plaintiff's members also conducted meetings, answered inquiries (for example, about when and where to vote), and created and paid for materials to be printed to address confusion and to conduct outreach about how to vote in the 2018 elections, including the early voting schedule, which changed after this lawsuit was filed.

Plaintiff's executive board also managed and coordinated logistics around how to vote and how to use early voting on top of its general activities, including educating first-time voters and providing resources for how and where to vote.

#### **INTERROGATORY NO. 12**

Please state each way in which the Panther Party "diverted its modest financial...resources to assisting PVAMU student voters by hosting trainings, organizing group transportation to early voting locations and conducting other educational and organizing activities..." as alleged in paragraph 17 of Plaintiffs' First Amended Complaint. Your answer should identify each financial expenditure or payment by the Panther Party in regard to the general election, including to whom the expenditure was made, the method of payment (i.e., cash, check, credit card, etc...), as well as how those expenditures or payments differed or diverted from the Panther Party's use of its financial resources.

#### **ANSWER TO NO. 12**

Plaintiff objects to Interrogatory No. 12 to the extent that it seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Plaintiff further objects to Interrogatory No. 12 because it is not limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome.

In addition, Plaintiff objects to Interrogatory No. 12 to the extent that it seeks documents, records of financial transactions, or information protected from disclosure by any privilege or immunity, or rule of confidentiality. If any protected information or material is disclosed, such disclosure is not intentional and shall not be deemed a waiver of any privilege or protection.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that since its founding in 2017 and consistent with its organizational mission, it regularly engages in general voter registration and voter education activities, including voter registration drives and candidate forums. As explained in Interrogatory No. 7, it does so on a limited budget – without significant (or any) membership dues, without consistent funding from PVAMU, and without support from any national organization.

In the 2018 general election, however, Plaintiff had to divert its already limited resources



away from these regular activities to address the complete absence of early voting on campus during the first week of early voting and the limited amount of early voting on PVAMU's campus during the second week. In the face of its regular activities and class and/or work obligations, organizational leaders and members testified before the commission hearings on October 17, 2018 to urge on-campus early voting.

Moreover, Plaintiff's members volunteered their time and other resources (for example, cars, gas money) to drive students to off-campus polling locations during the first week of early voting for students who would have otherwise been unable to cast a vote because of their other obligations (for example, class schedules, work obligations) and lack of access to transportation. Volunteers drove student voters off-campus on, for example six days. Volunteers, like individual Plaintiff Allen, used their own cars, paid for gas out-of-pocket, and rearranged their schedules and other obligations. Defendant Commissioners Court heard testimony (for example, at the October 17, 2018 hearing at 93:24) that students have limited funds and paying for gas is a significant expenditure for them, as it is for organizational Plaintiff and its members.

Plaintiff's members also conducted meetings, answered inquiries, and created and paid for materials to address confusion and conduct outreach about how to vote in the 2018 elections, including the early voting schedule. Because of the organizational Plaintiff's limited funds, Joshua Mohammed, for example, paid between \$50-\$100 to print materials out-of-pocket.

These efforts also forced Plaintiff's executive board team to expend time to manage and coordinate logistics around how to vote and use early voting that were not part of general activities, including educating first-time voters and providing resources for how and where to vote.

### **INTERROGATORY NO. 13**

Please identify any items, funds, or services that were donated to assist the Panther Party in its efforts related to the 2018 election.

### **ANSWER TO NO. 13**

Plaintiff objects to Interrogatory No. 13 in that such undefined terms as "items," "services," and "donated" are vague, ambiguous, overly broad, and unduly burdensome. Plaintiff further objects to the extent that Interrogatory No. 13 seeks to impose obligations on Plaintiff in excess of those set forth in the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Southern District of Texas. Plaintiff further objects that this Interrogatory is in part duplicative of Interrogatories Nos. 11 and 12.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff further respond that it received a single \$200 donation from Mike Siegel to conduct non-partisan voter registration in 2018. Plaintiff used this money to purchase food as part of a freshman voter registration event.



**INTERROGATORY NO. 14**

If any members of the Panther Party experienced any difficulties or impediments to early voting during the 2018 general election, please identify the member(s) and describe those difficulties or impediments in detail.

**ANSWER TO NO. 14**

Plaintiff objects to Interrogatory No. 14 because it is worded to require a legal conclusion and is predicated on legal definitions, conclusions, and arguments. Plaintiff also objects to this Interrogatory to the extent that it mischaracterizes Plaintiffs' claim in this lawsuit as being about difficulties or impediments to early voting during the 2018 general election. To the extent that the Interrogatory seeks factual information, Plaintiff objects to Interrogatory No. 14 as it is a premature interrogatory request that seeks a comprehensive identification of relevant facts before the close of discovery. *See* FED. R. CIV. P. 33(a)(2); *Wallace v. GEO Grp., Inc.*, No. 2:12-cv-2745, 2013 WL 6490320, at \*3 (W.D. La. Dec. 10, 2013). Plaintiff also objects to Interrogatory No. 14 as it is unreasonably duplicative of Plaintiffs' expert-witness reports of Mr. Cooper, Dr. Flores, Dr. Joseph, and Dr. Stein, as well as information in Plaintiffs' First Amended Complaint (ECF No. 49), Plaintiffs' Motion and Memorandum of Law in Opposition to Defendants' Motion to Dismiss (ECF No. 53), which address this request and are currently in Defendants' possession.

Plaintiff further objects to Interrogatory No. 14 because it seeks the identities of its members, the compelled disclosure of which would "abridge the rights of its . . . members to engage in lawful association in support of their common beliefs," which is protected by the First Amendment to the U.S. Constitution. *NAACP v. State of Alabama ex rel. Patterson*, 357 U.S. 449, 460 (1958); *see id.* at 462-63 (holding "that compelled disclosure of [a civil rights association's] membership is likely to affect adversely the ability of [the association] and its members to pursue their collective effort to foster beliefs which they admittedly have the right to advocate, in that it may induce members to withdraw from the [a]ssociation and dissuade others from joining it because of fear of exposure of their beliefs shown through their associations and of the consequences of this exposure."). Plaintiff further objects to Interrogatory No. 14 to the extent it requires the disclosure of protected material, including but not limited to confidential information or any information implicating privacy interests.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that current or former members of organizational Plaintiff are identified in Interrogatory No. 9; these current or former members also are individual Plaintiffs in this lawsuit and have provided individual responses to the information sought through this Interrogatory No. 14 in their respective responses to Defendants' first interrogatories. Former or current members of organizational Plaintiff also provided testimony at commissioners court hearings (for example, on October 17, 2018) about their concerns with Defendants' early voting plans.

**INTERROGATORY NO. 15**

Please state with specificity each factual basis for your contention that your right to vote

was abridged or denied as a result of the early voting schedule in Waller County for the 2018 general election.

**ANSWER TO NO. 15**

Plaintiff objects to Interrogatory No. 15 because it is worded to require a legal conclusion and is predicated on legal definitions, conclusions, and arguments. Plaintiff also objects to this Interrogatory because organizational Plaintiff does not have an individual right to vote. Plaintiff further objects to the extent this is a premature interrogatory request that seeks a comprehensive identification of relevant facts before the close of discovery. *See* FED. R. CIV. P. 33(a)(2); *Wallace v. GEO Grp., Inc.*, No. 2:12-cv-2745, 2013 WL 6490320, at \*3 (W.D. La. Dec. 10, 2013). Plaintiff also objects to Interrogatory No. 15 to the extent that it is unreasonably duplicative of the Plaintiffs' expert-witness reports by Mr. Cooper, Dr. Flores, Dr. Joseph, and Dr. Stein, as well as information in Plaintiffs' First Amended Complaint (ECF No. 49) and Plaintiffs' Motion and Memorandum of Law in Opposition to Defendants' Motion to Dismiss (ECF No. 53), which address this request and are currently in Defendants' possession.

**INTERROGATORY NO. 16**

Please state with specificity each factual basis for your contention that there was a lack of adequate early voting in the City of Prairie View and/or PVAMU during the 2018 general election.

**ANSWER TO NO. 16**

Plaintiff objects to Interrogatory No. 16 to the extent that it mischaracterizes Plaintiffs' claim in this lawsuit as being about the adequacy of early voting in the City of Prairie View and/or PVAMU during the 2018 general election. Plaintiff also objects to Interrogatory No. 16 insofar as it seeks documents or information, such as the County's early voting plans for the November 2018 general election, which are already in Defendants' possession. For the same reason, Plaintiff objects to Interrogatory No. 16 insofar as it seeks documents or information that are obtainable from some other source that is less burdensome or less expensive. Plaintiff also objects to Interrogatory No. 10 as it is unreasonably duplicative of Plaintiffs' expert-witness reports of Mr. Cooper, Dr. Flores, Dr. Joseph, and/or Dr. Stein, as well as Plaintiffs' First Amended Complaint (ECF No. 49) and Plaintiffs' Motion and Memorandum of Law in Opposition to Defendants' Motion to Dismiss (ECF No. 53), which address this question and are currently in Defendants' possession.

**INTERROGATORY NO. 17**

If you contend that early voting hours during the first week of early voting provide a greater opportunity to cast a ballot than early voting hours the second week, please state with specificity each factual basis for that contention.



**ANSWER TO NO. 17**

Plaintiff objects to Interrogatory No. 17 because it erroneously sets forth a contention that Plaintiff has not advanced in this case.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that its answers are included in Plaintiffs' First Amended Complaint (ECF No. 49) and Plaintiffs' Motion and Memorandum of Law in Opposition to Defendants' Motion to Dismiss (ECF No. 53). Plaintiff's response is further supported by expert-witness reports of Mr. Cooper, Dr. Stein, Dr. Joseph, and/or Dr. Flores and the resources cited therein.

Moreover, Plaintiff responds that commissioners court meetings (for example, on October 17, 2018) are already in Defendants' possession, including testimony from Joshua Mohammed, other PVAMU current and former students, and other advocates urging additional early voting on-campus in 2018, including at least one day of early voting on campus during the first week and their reasons for this demand.

**INTERROGATORY NO. 18**

Please describe any activities or efforts the Panther Party undertook to advocate or petition for a greater number of early voting hours, prior to joining this lawsuit. Your answer should include, but is not limited to, identifying any communications by or on behalf of the Panther Party with officials, employees, or representatives of Waller County or PVAMU regarding early voting in Prairie View, by specifying with whom you had such communications, the manner of communication (i.e., in-person, phone call, email, text message, etc...), the approximate date and time of each communication, and the substance of each communication.

**ANSWER TO NO. 18**

Plaintiff objects to Request No. 18 because it is not limited to any reasonable time period and thus is vague, ambiguous, overly broad, and unduly burdensome. Plaintiff further objects to the extent that it seeks information already in the possession, custody, or control of Defendant Waller County and its officials, employees, or representatives.

Subject to and without waiving Plaintiff's foregoing general and specific objections, Plaintiff responds that commissioners court meetings (for example, October 17, 2018) are already in the possession of Defendants, including testimony from current or former Panther Party leaders and members, like Joshua Mohammed, urging additional early voting on-campus in 2018, including at least one day of early voting on campus during the first week and their reasons for this demand.

In addition, Plaintiff participated in community education and civic engagement meetings on campus to discuss strategies to advocate for a great number of early voting hours.

**INTERROGATORY NO. 19**

If you contend that the Waller County Community Center is inaccessible to Panther Party members, please state with specificity each of your factual bases for that contention.

**ANSWER TO NO. 19**

Plaintiff objects to Interrogatory No. 19 because it erroneously sets forth a contention that Plaintiff has not advanced in this case and/or mischaracterizes Plaintiffs' contention about the Waller County Community Center as a site for early voting for PVAMU students. Plaintiff also objects to Interrogatory No. 19 as it is unreasonably duplicative of the expert-witness reports of Mr. Cooper, Dr. Stein, Dr. Joseph, and/or Dr. Flores and or commissioners court hearing minutes (for example, for October 17, 2018), which address this question and are currently in the possession of Defendants. Specifically, commissioners court meetings (for example, October 17, 2018) already in Defendants' possession, including testimony from current or former Panther Party leaders and members, like Joshua Mohammed, urging additional early voting on-campus in 2018, including at least one day of early voting on campus during the first week and their reasons for this demand.



Respectfully submitted on July 29, 2019,

**Of Counsel:**

/s/ Leah C. Aden

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

This is to certify that on July 29, 2019, I electronically sent a true and correct copy of the foregoing document to all counsel of record in this case.

/s/ Leah C. Aden  
Leah C. Aden

VERIFICATION

STATE OF TEXAS

COUNTY OF FORT BEND

§  
§  
§

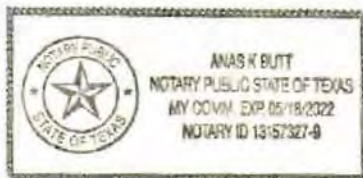
**BEFORE ME**, the undersigned, on this date personally appeared Joshua Muhammad (Perkins) as a representative on behalf of the Panther Party, known to me to be the person whose name is subscribed below, who states, upon oath, that the statements made in the foregoing instrument are within his personal knowledge as a representative on behalf of the Panther Party and are true and correct to the best of his knowledge, information, and belief. The Panther Party reserves the right to make changes to the Responses if at any time it appears that an error or omission has been made therein or if additional or more accurate information becomes available.

Josh Perkins

Joshua Muhammad (Perkins)  
as a Representative on behalf of the Panther Party

SWORN TO AND SUBSCRIBED BEFORE ME this 29<sup>th</sup> day of JULY

2019, to certify which witness my hand and seal of office.



Anas K Butt  
Notary Public in and for the State of Texas





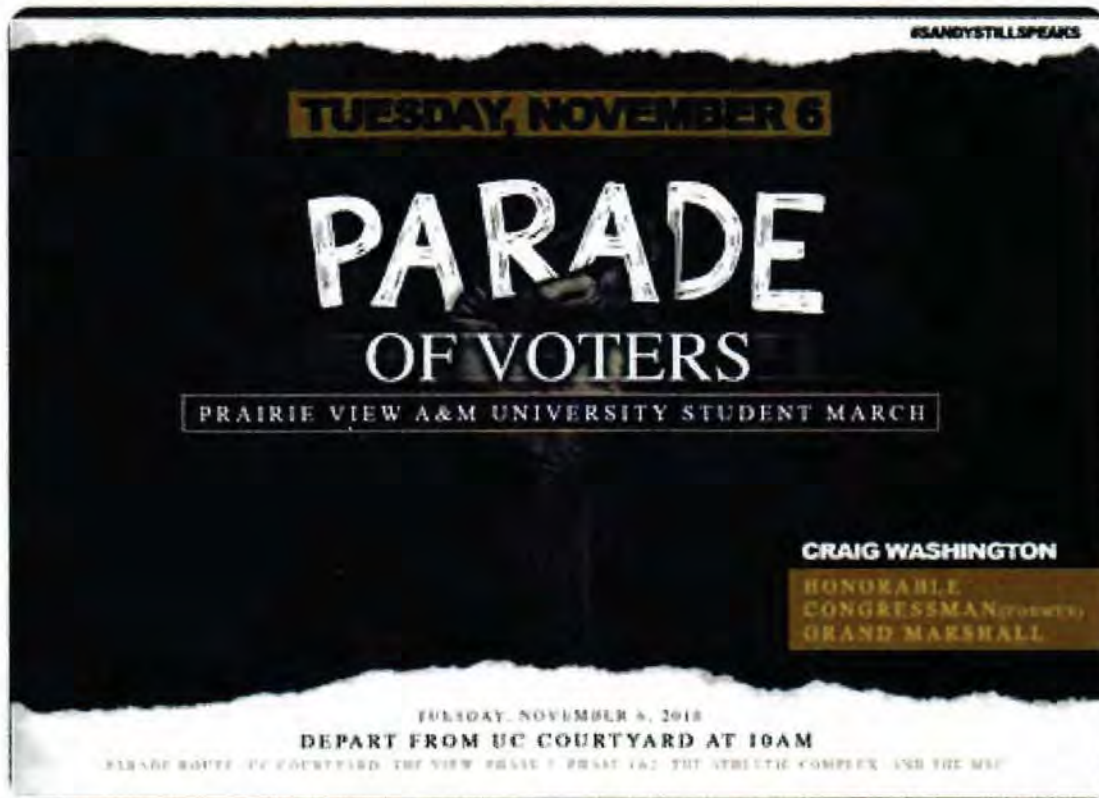
The Panther Party Retweeted



**Lowe**

@Maydrianlowe

When people ask us about the 2018 election, let's tell them about what we did to elect Democrats up and down the ballot. We get one extra hour today. Let's use it to knock on doors and call up our neighbors to make sure they have a march to the polls. It will make a difference-KH



3:07 PM · Nov 4, 2018 · [Twitter for iPhone](#)

8 Retweets 7 Likes

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EXHIBIT	8
WIT:	Muhammad
DATE:	10-10-19
Sherri S. Fisher, CSR	

The Panther Party Retweeted

**PV Panther**  
@PVPantherOnline

## Setting the Record Straight: How Students Can Vote on Campus |



Setting the Record Straight: How Students Can Vote on Campus - PV Panther ...  
Throughout the years, Prairie View A&M University students have faced injustices and obstacles when it comes to being able to vote within Waller ...  
[pvpanthernews.com](http://pvpanthernews.com)

7:33 PM · Oct 9, 2018 · [Twitter for iPhone](#)

45 Retweets 40 Likes

PLS000252



News

⚡ Trending

# Setting the Record Straight: How Students Can Vote on Campus

Setting the record straight on what is needed to vote on campus.



Daric Cottingham ✉ • October 9, 2018 0 🔥 5,009

Throughout the years, Prairie View A&M University students have faced injustices and obstacles when it comes to being able to vote within Waller county. The most recent plight against students' right to vote was a rumor that students would be turned away from voting. To keep students informed with the correct information, I was able to reach out to the Elections Administrator for Waller County, Christy Eason.

## Knowing the Issue

While speaking with Christy Eason, she was able to clarify the misunderstanding of placing some students in the wrong precinct. In 2016, many students were registered to vote and informed to use the 700 University Drive address if they lived in the campus dorms. However, it is now known that this address is an actual residential address for the City of Prairie View which holds a different precinct, 310. The Prairie View A&M University campus precinct is 309. Knowing the difference between physical and mailing addresses can help prevent this type of issue when registering to vote. A mailing address is an address at which a person or business receive letters or packages, which

can be different from the place where they work or live. Knowing these exact addresses makes registering to vote a smoother process.

These precincts determine voting locations, those under 309 can vote on campus while others in 310 have a voting location at Prairie View City Hall. During the recent Primary Elections, this discrepancy was found. Eason stated, "In the Primary election we had found that some of the students were registered in precinct 309, which is the university's precinct. But then some of them were also registered in 310 which is the city's voting block."

#### Finding the Solution

“

*Eason then went to the drawing board to find a solution, "We have to find a way to get all of those registered in precinct 310 back to 309."*

Eason then went to the drawing board to find a solution, "We have to find a way to get all of those registered in precinct 310 back to 309. " Anyone with 700 University Drive as their physical address will be allowed to vote, "no one will be turned away," Eason reassured. Students with 700 University Drive as their address will need to fill out an address change form at the voting polls. This address change form will place students in the correct precinct for the campus, 309. Students who will be newly registering to vote are encouraged to use the correct physical address for their respective dorm on campus.





Here is a list of the acceptable forms of photo ID:

- Texas Driver License issued by the Texas Department of Public Safety (DPS)
- Texas Election Identification Certificate issued by DPS
- Texas Personal Identification Card issued by DPS
- Texas Handgun License issued by DPS
- United States Military Identification Card containing the person's photograph
- United States Citizenship Certificate containing the person's photograph
- United States Passport (book or card)

Students can check their voter registration status [here](#).

Early Voting will be in the Willie A. Tempton Memorial Student Center October 29th – 31st 8am-5pm

Election Day will be in the Willie A. Tempton Memorial Student Center November 6th 7 am – 7 pm



EXHIBIT

9

WIT: MuhammedDATE: 10-10-19

Sherri S. Fisher, CSR



Jayla Allen

October 12, 2018

Official statement from Texas Secretary of State! #PVAMU #Vote



*It has been communicated and confirmed that the Waller County plan ensures, as it was always intended to do, that all students residing on campus who are registered to vote in the county will be able to cast their ballots at the Precinct 309 polling location on campus, and that no students will be impeded, hampered, or otherwise delayed in exercising their constitutional right to cast a ballot in the upcoming General Election. No change of address form or statement of residence will be required prior to voting. After students vote, they will be able to update their address for future elections.*



20

3 Comments 2 Shares

PLS000017



Google Maps Waller County Community Center



Imagery ©2019 Google, Imagery ©2019 Houston-Galveston Area Council, Maxar Technologies, Texas General Land Office, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2019

EXHIBIT	12
WITNESS	Notarized
DATE:	10-19
Sherri S. Fisher, CSR	



**PVAMU Transportation Office Hours**

Monday – Friday 8:00 AM – 5:00 PM

Phone: 936-261-1140 For Special

Assistance Please Contact: 936-261-3585

**PVAMU TRANSPORTATION SCHEDULE**[www.trackthepanther.com](http://www.trackthepanther.com)

Route	Runs every	15 minutes
<b>On Campus Loop</b>	Depart (MSC)	Last Run (MSC)
Monday - Friday		

PURPLE runs every 30 min from the MSC  
**GOLD** runs once an hour from the MSC

First Departure from MSC @ 7:00 am / Last Departure from the MSC @ 5:00 pm									
Off Campus PURPLE route	MSC (Leave)	Pine Island	Brookside/ Panther Hill	University Trails	Creekside	MSC (Arrive)			
A Mon.-Fri.	:00	:12	:15	:17	:19	:22			
B Mon.-Fri.	:30	:42	:45	:47	:49	:52			
First Departure from MSC @ 7:00 am / Last Departure from the MSC @ 6:00 pm									
Off Campus GOLD route	MSC (Leave)	The Ranch	Empty Eye II	Empty Eye I	Valero	Dollar General	Echols & University	Panther Quarters	Panther Plaza
A Mon.-Fri.	:00	:14	:24	:26	:27	:28	:29	:30	:32
									Architecture Bld.
									MSC (Arrive)
									:38
NorthWest Campus Route									
NorthWest GREEN Campus	MSC (Leave)	NorthWest	MSC (Arrive)						
A Mon.-Thurs	4:30 pm	5:15 pm	6:30 pm						
B Mon.-Thurs	8:15 pm	9:00 pm	9:45 pm						
First Departure from MSC @ 6:00 pm / Last Departure from the MSC @ 9:00 pm									
Black Route	MSC (Leave)	Brookside/ Panther Hill	Pine Island	The Ranch	MSC (Arrive)				
Mon.-Thurs.	:00	:09	:12	:24	:38				
	7:00 8:00	7:09 8:09	7:12 8:12	7:24 8:24	7:38 8:38				
Sat.	1:00 2:00	1:09 2:09	1:12 2:12	1:24 2:24	1:38 2:38				

Stop at Cypress made by Request

**Stop at Cypress made by Request**

EXHIBIT 13

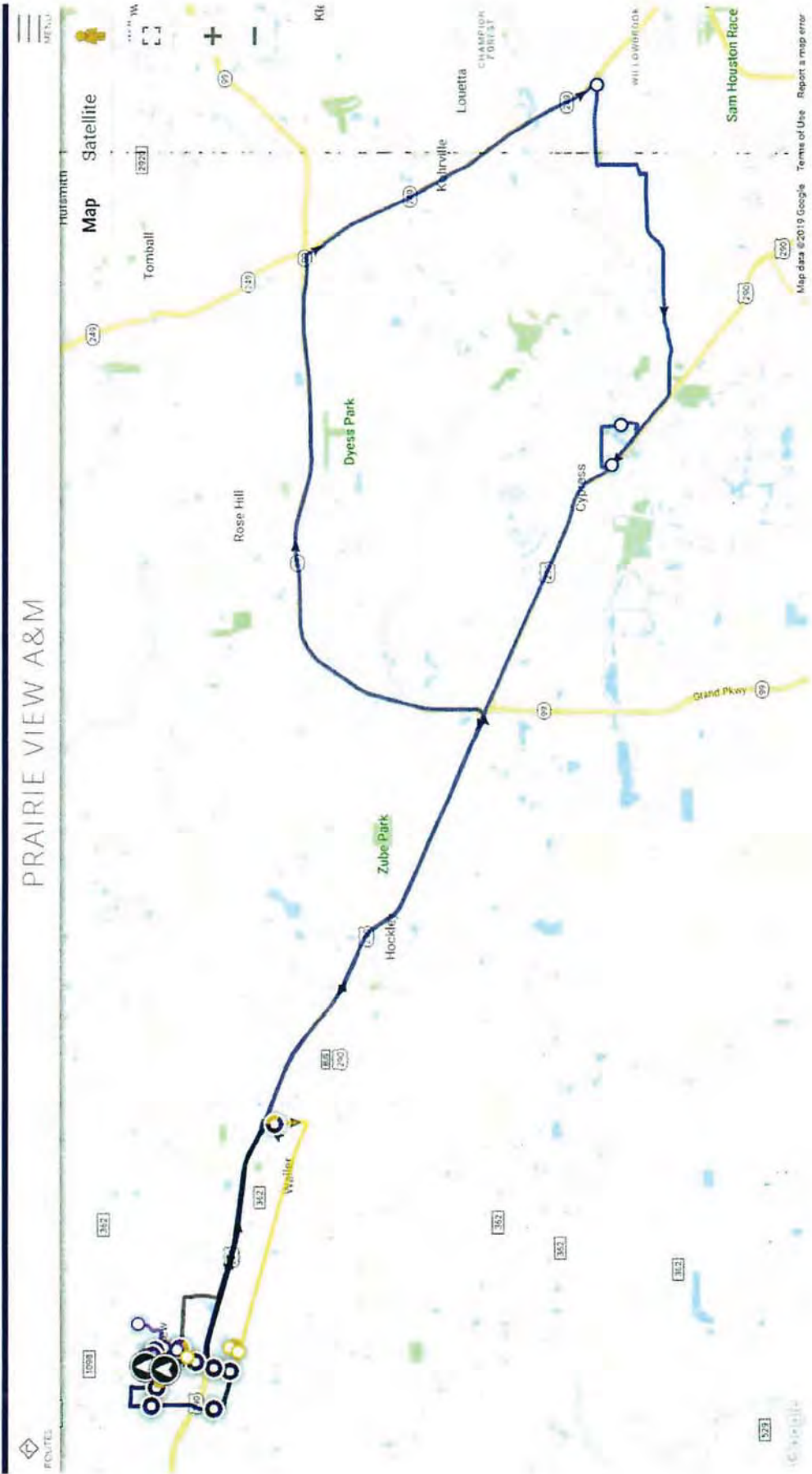
WIT: *Muchanga*

DATE: 10-10-19

Sherri S. Fisher, CSR

**PLS000329**

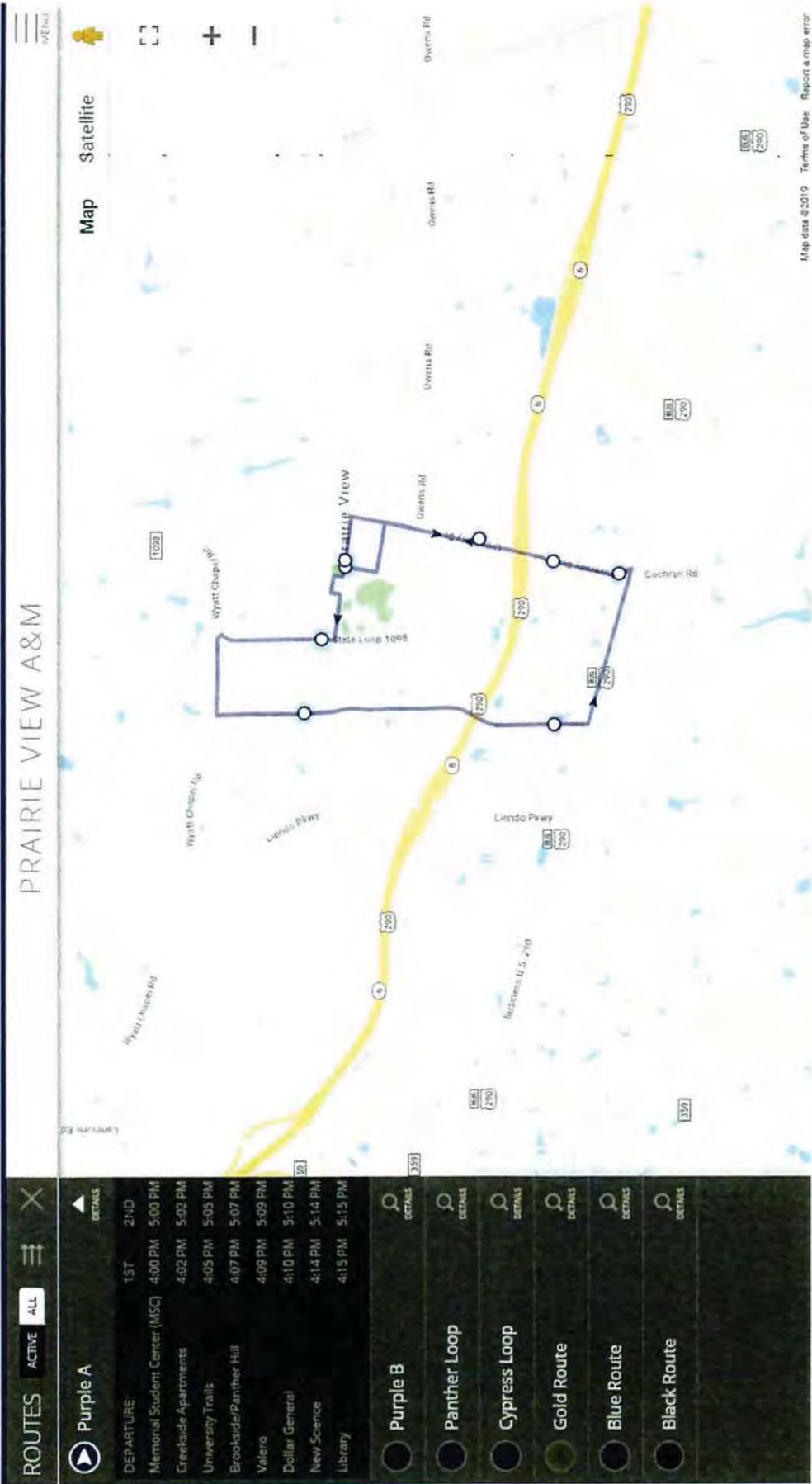
All routes.



PLS000330

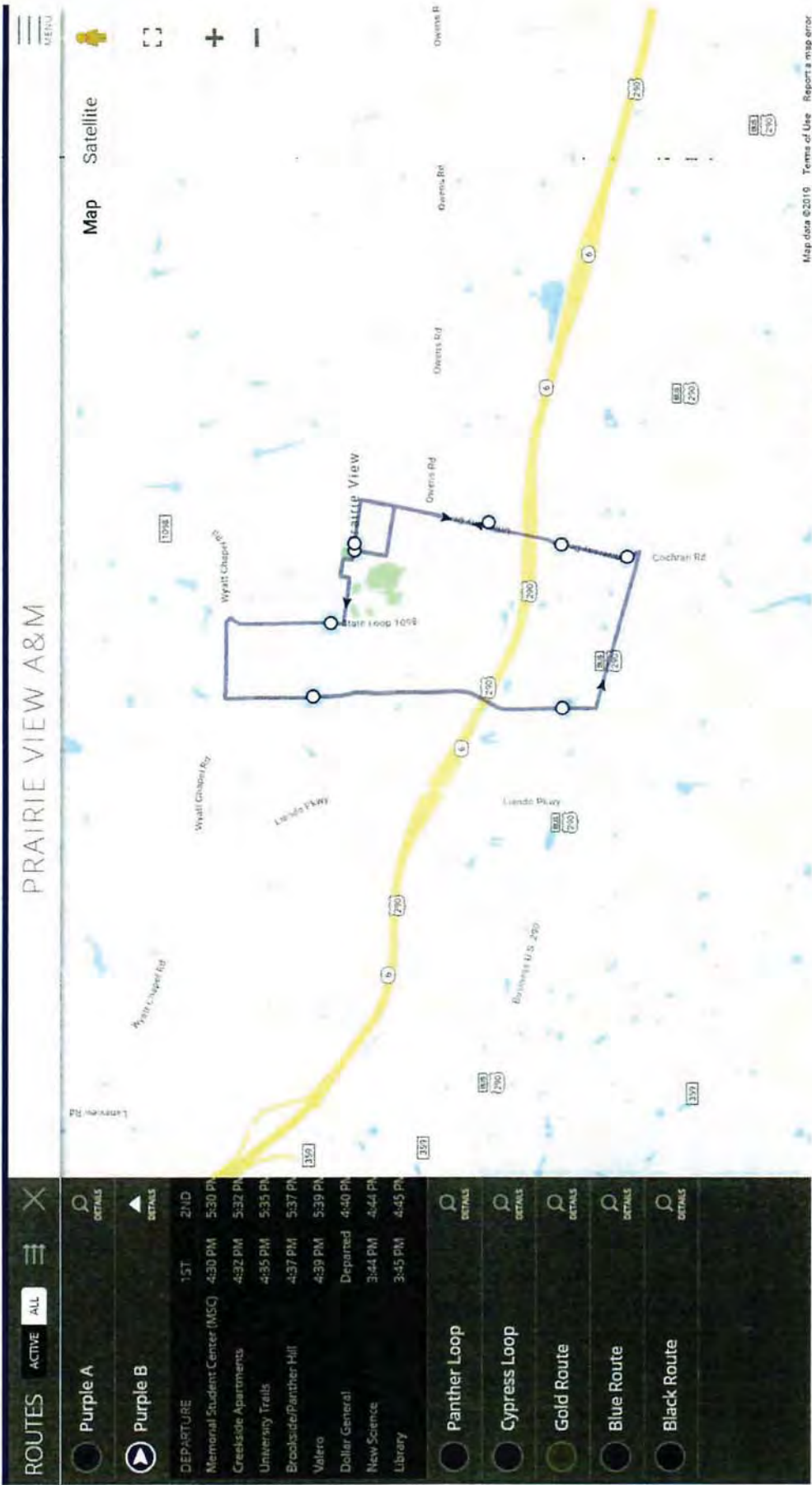


Purple A route.



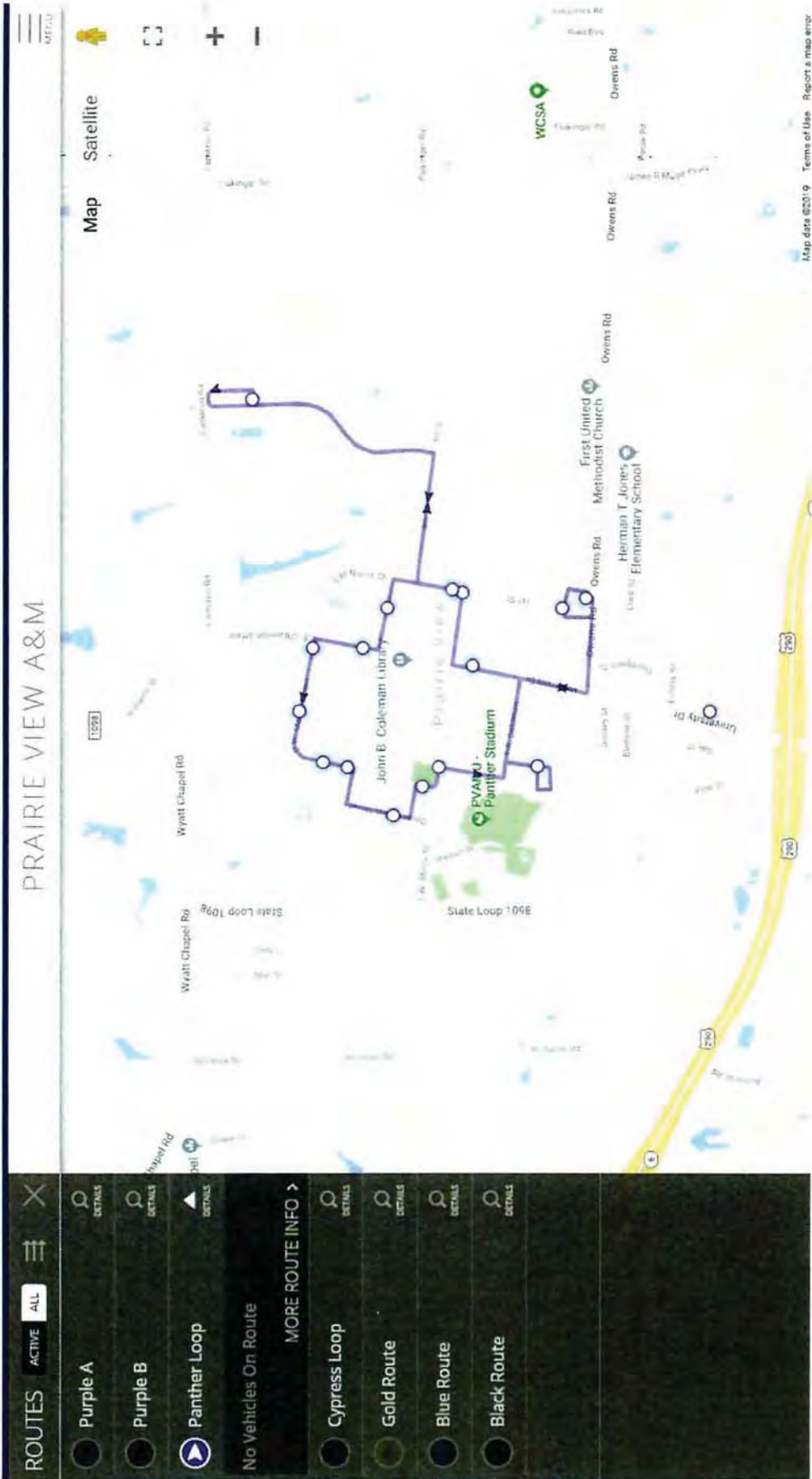
PLS000331

Purple B route.



PLS 000332

Panther Loop route.

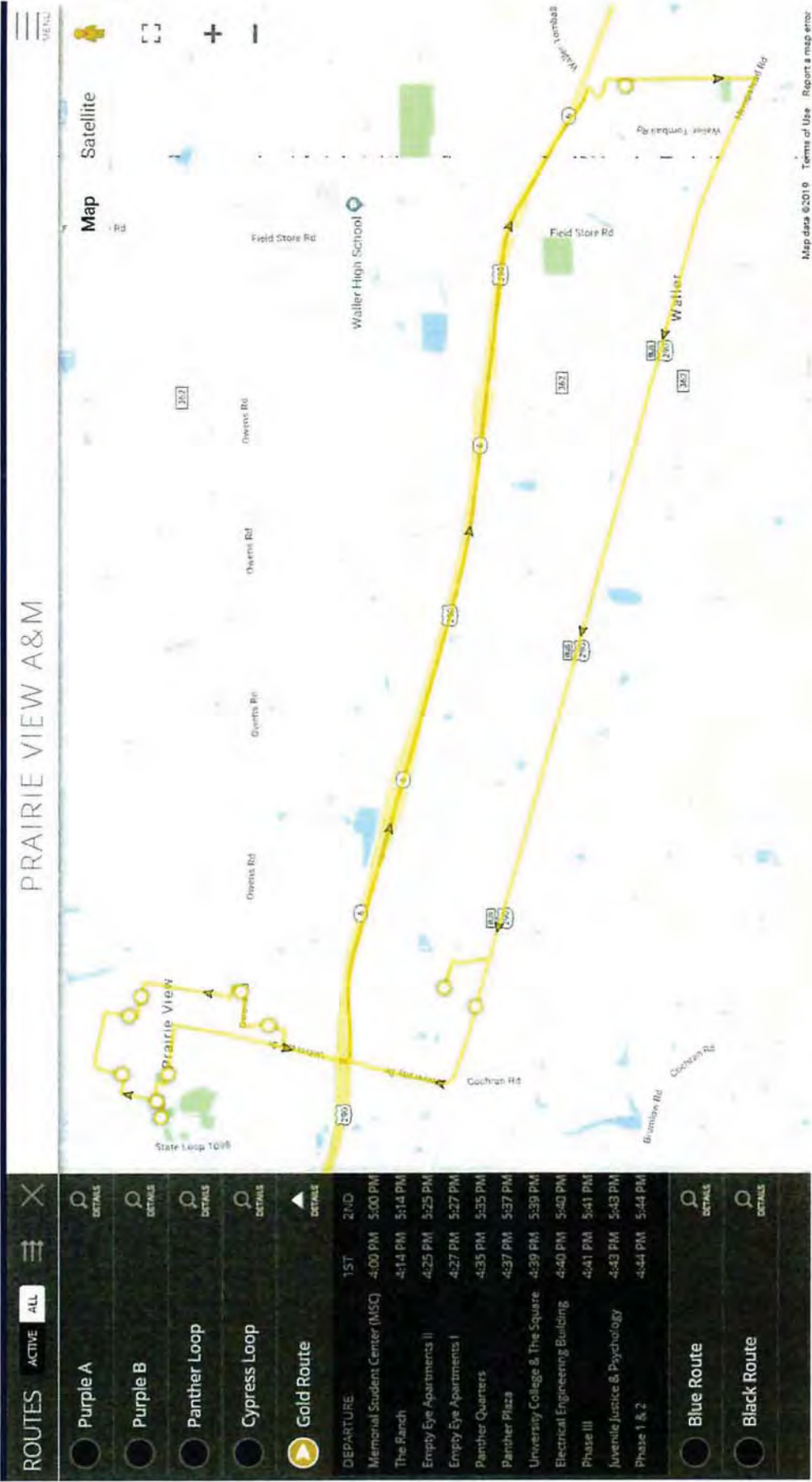


PLS000333



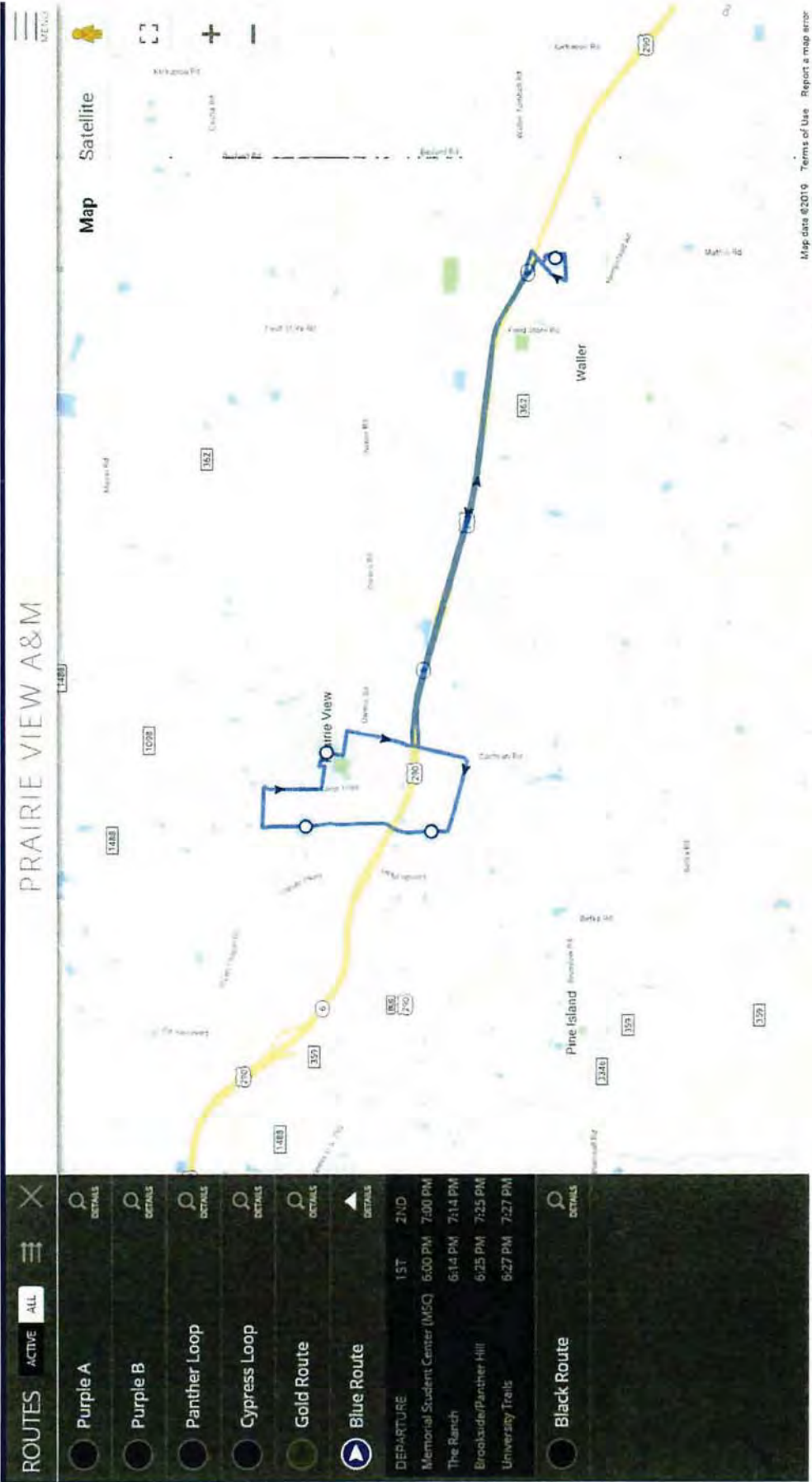


Gold route.



PLS000335

Blue route.



PLS000336





PLS000337

2018 GENERAL ELECTION WALLER COUNTY AND ROYAL ISD		EARLY VOTING LOCATIONS
DURING EARLY VOTING ALL PRECINCTS AND ENTITIES CAN VOTE AT ANY LOCATION		
<b>WEEK ONE</b>		
MONDAY – FRIDAY October 22 – 26, 2018	Waller County Courthouse 836 Austin St, Hempstead, Tx	8am – 5pm
SATURDAY October 27, 2018		9am – 2pm
SUNDAY October 28, 2018		12pm – 5pm
MONDAY – FRIDAY October 22 – 26, 2018	Waller ISD Admin Bldg. 2214 Waller St., Waller, Tx	8am – 5pm
SATURDAY October 27, 2018		9am – 2pm
MONDAY – FRIDAY October 22 – 26, 2018	Waller Co Library Brookshire 3815 6 <sup>th</sup> St., Brookshire, Tx	8am – 5pm
SATURDAY October 27, 2018		9am – 2pm
SUNDAY October 28, 2018		12pm – 5pm
THURSDAY – FRIDAY October 25 – 26, 2018	Fieldstore County Bldg., JP 2 27388 Fieldstore Rd., Waller, Tx	8am – 5pm
SATURDAY October 27, 2018		9am – 2pm
THURSDAY – FRIDAY October 25 – 26, 2018	Monaville County Bldg., JP 3 12620 FM 1887, Hempstead, Tx	8am – 5pm
SATURDAY October 27, 2018		9am – 2pm
MONDAY – WEDNESDAY October 22 – 24, 2018	Katy VFW 2606 George Bush Dr., Katy, Tx	8am – 5pm
SUNDAY October 28, 2018	Prairie View City Hall	12pm – 5pm
<b>WEEK TWO</b>		
MONDAY – WEDNESDAY October 29 – 31, 2018	Waller Co Courthouse 836 Austin St, Hempstead, Tx	8am – 5pm
THURSDAY – FRIDAY November 1 – 2, 2018		7am – 7pm
MONDAY – WEDNESDAY October 29 – 31, 2018	Waller ISD Admin Bldg. 2214 Waller St., Waller, Tx	8am – 5pm
THURSDAY – FRIDAY November 1 – 2, 2018		7am – 7pm
MONDAY – WEDNESDAY October 29 – 31, 2018	Waller Co Library Brookshire 3815 6 <sup>th</sup> St., Brookshire, Tx	8am – 5pm
THURSDAY – FRIDAY November 1 – 2, 2018		7am – 7pm
MONDAY – WEDNESDAY October 29 – 31, 2018	Memorial Student Center PVAMU, Prairie View, Tx	7am – 7pm
THURSDAY – FRIDAY November 1 – 2, 2018	WC Community Center – PV FM 1098, Prairie View, Tx	7am – 7pm

EXHIBIT 14

WIT: MuhammadDATE: 10-10-19

Sherri S. Fisher, CSR

DEFENDANTS000158



EXHIBIT	15
WIT:	Muhammad
DATE:	10/10/19
Sherri S. Fisher, CSR	

The Panther Party Retweeted



HD  
@\_darroo

Only took 5 minutes go vote pv



11:09 AM · Oct 31, 2018 · [Twitter for iPhone](#)

30 Retweets 61 Likes


PLS000298



1.1 The Panther Party Retweeted



**Tuh! Its Bethany**  
@iitsbethanyy

I VOTED  Now y'all go do the same!! It takes less than 5 minutes

12:19 PM · Oct 29, 2018 from [Prairie View, TX](#) · [Twitter for iPhone](#)

4 Retweets 13 Likes

PLS000289

